

EXHIBIT 28-6



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From November 27, 2012 to December 28, 2012

Page 1 of 2

Summary of Account Activity		
Previous Balance		\$0.00
Payments	+	\$0.00
Other Credits	-	\$0.00
Purchases/Debits	+	\$5,524.51
Balance Transfers	+	\$0.00
Cash Advances	+	\$0.00
Past Due Amount		\$0.00
Fees Charged	+	\$0.00
Interest Charged	+	\$0.00
New Balance		\$5,524.51
Revolving Credit Limit		\$11,500.00
Revolving Credit Available		\$5,975.49
Statement Closing Date		December 28, 2012
Days in Billing Cycle		31

Payment Information	
New Balance	\$5,524.51
Minimum Payment Due	\$56.00
Payment Due Date	January 22, 2013

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	21 Years	\$16,923
\$226	3 Years	\$8,145 (Savings = \$8,778)

If you would like information about credit counseling services call 1-866-569-2227.

Questions?

24-Hour Customer Service
 Lost or Stolen Card
 Outside USA Collect
 TDD/Hearing Impaired

1-888-662-4722
 1-800-327-4214
 1-716-841-6866
 1-800-655-9392

Payment Address: HSBC Card Services, PO Box 5255, Carol Stream, IL 60197-5255

Billing Inquiries: HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029

Manage Your account online at www.HSBCPREMIERUSA.com

Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
12/05/12	12/06/12	THY - WWW.THY.COM ISTANBUL TUR		MT123410116000010188555	\$5,324.90
12/10/12	12/11/12	YAKAMOZ RES.SU URN.GID ISTANBUL TUR		MT123460120000010193204	\$162.67
	12/10/12	290.00 TRY			
12/12/12	12/13/12	BTA-LIPTON ISTANBUL TUR		MT123480120000010076951	\$4.24
	12/12/12	7.50 TRY			
12/16/12	12/17/12	BODRUM MANTI CAFE ISTANBUL TUR		MT123520118000010214628	\$32.70
	12/16/12	58.00 TRY			
Total Purchases For This Period					\$5,524.51
Fees					
Trans Date	Post Date	Description of Fees	Reference Number		Amount
Total Fees For This Period					\$0.00

Detach and return bottom portion with your payment.

140830 4 27 0000000411

STMT66 D 8 898 PNE1

See reverse side for Important Information



Account Number: 5451-9846-6573-9288
 New Balance \$5,524.51
 Minimum Payment Due \$56.00
 Payment Due Date 01/22/2013

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140
 AMOUNT
 ENCLOSED

ALI SADR
 6445 ROCK FOREST DR
 APT 209
 BETHESDA MD 20817-8802

HSBC CARD SERVICES
 PO BOX 5255
 CAROL STREAM IL 60197-5255



00552451000056000005451984665739288001402

**GOVERNMENT
 EXHIBIT
 495B
 18 Cr. 224 (AJN)**



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From November 27, 2012 to December 28, 2012

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Interest Charged	
Description of Interest Charge	Amount
INTEREST CHARGE ON CASH ADVANCES	\$0.00
INTEREST CHARGE ON PURCHASES	\$0.00
INTEREST CHARGE ON BALANCE TRANSFERS	\$0.00
Total Interest For This Period	\$0.00

2012 Totals Year to Date	
Total fees charged in 2012	\$125.00
Total interest charged in 2012	\$226.15

Interest Charge Calculation			
Your Annual Percentage Rate (APR) is the annual interest rate on your account.			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$0.00	\$0.00
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00
v=Variable Rate			

HSBC PREMIER REWARDS Summary		
Previous Points	173,718	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.
Points	5,523	
Total Points	181,243	

Customer News	
Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.	



HSBC PREMIER WORLD MASTERCARD

 HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From December 28, 2012 to January 28, 2013

Page 2 of 2

01/18/13	01/19/13	CAFE PRESSE CLUB CHE	ZUERICH	MT130190118000010153259	\$86.99
	01/18/13	81.30	CHF		
Total Purchases For This Period					\$1,909.90
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount
01/22/13	01/22/13	LATE CHARGE ASSESSMENT		10000004110122999632180	\$25.00
Total Fees for This Period					\$25.00
Interest Charged					
		Description of Interest Charge			Amount
		INTEREST CHARGE ON CASH ADVANCES			\$0.00
		INTEREST CHARGE ON PURCHASES			\$168.06
		INTEREST CHARGE ON BALANCE TRANSFERS			\$0.00
Total Interest For This Period					\$168.06
2013 Totals Year to Date					
Total fees charged in 2013				\$25.00	
Total interest charged in 2013				\$168.06	

Interest Charge CalculationYour **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$7,264.21	\$168.06
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

HSBC PREMIER REWARDS Summary

Previous Points	181,243
Points	1,910
Total Points	183,153

Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.

Customer News

Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From January 28, 2013 to February 25, 2013

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Summary of Account Activity		
Previous Balance		\$7,627.47
Payments	-	\$0.00
Other Credits	-	\$0.00
Purchases/Debits	+	\$474.76
Balance Transfers	+	\$0.00
Cash Advances	+	\$0.00
Past Due Amount		\$326.00
Fees Charged	+	\$25.00
Interest Charged	+	\$165.36
New Balance		\$8,292.59
Revolving Credit Limit		\$11,500.00
Revolving Credit Available		\$0.00
Statement Closing Date		February 25, 2013
Days in Billing Cycle		28

Payment Information		
New Balance		\$8,292.59
Minimum Payment Due		\$600.00
Payment Due Date		March 22, 2013
Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	23 Years	\$24,803
\$340	3 Years	\$12,226 (Savings = \$12,577)
If you would like information about credit counseling services call 1-866-569-2227.		

Questions?

24-Hour Customer Service
 Lost or Stolen Card
 Outside USA Collect
 TDD/Hearing Impaired

1-888-662-4722
 1-800-327-4214
 1-716-841-6866
 1-800-655-9392

Payment Address: HSBC Card Services, PO Box 5255, Carol Stream, IL 60197-5255

Billing Inquiries: HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029

Manage Your account online at www.HSBCPREMIERUSA.com

Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
02/05/13	02/06/13	FH TAXI GMBH MUENCHEN DEU		MT130370119000010161148	\$208.11
	02/05/13	154.50 EUR			
02/21/13	02/23/13	RYANAIR DUBLIN IRL		MT130540118000010152783	
		NAME: BACCIFAVA/MEDEA			
		CTY OF ORGN: BGY TRVL DT: 022513			
		CTY DEST: BUD SVC PRVDR: FR			
		FARE TYPE: C STOPOVER:			
		Transaction Total			\$122.75
		02/21/13 000000008586 978			
		NAME: BACCIFAVA/MEDEA			
		CTY OF ORGN: BGY TRVL DT: 022513			
		CTY DEST: BUD SVC PRVDR: FR			
		FARE TYPE: C STOPOVER:			
		Transaction Total			\$0.00
02/21/13	02/23/13	RYANAIR DUBLIN IRL		MT130540118000010152784	
		NAME: BACCIFAVA/MEDEA			

Detach and return bottom portion with your payment.

140830 4 A 27 0000000411

STMT66 D 8 473 PMEI

See reverse side for important information



Account Number: 5451-9846-6573-9288
 New Balance \$8,292.59
 Minimum Payment Due \$600.00
 Payment Due Date 03/22/2013

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140

AMOUNT
 ENCLOSED

ALI SADR
 6445 ROCK FOREST DR
 APT 209
 BETHESDA MD 20817-8802

HSBC CARD SERVICES
 PO BOX 5255
 CAROL STREAM IL 60197-5255



00829259000600000005451984665739288001401



HSBC PREMIER WORLD MASTERCARD

 HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From January 28, 2013 to February 25, 2013

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		CTY OF ORGN: BGY TRVL DT: 022513		
		CTY DEST: BUD SVC PRVDR: FR		
		FARE TYPE: C STOPOVER:		
		Transaction Total		\$14.30
		02/21/13 000000001000 978		
		NAME: BACCIFAVA/MEDEA		
		CTY OF ORGN: BGY TRVL DT: 022513		
		CTY DEST: BUD SVC PRVDR: FR		
		FARE TYPE: C STOPOVER:		
		Transaction Total		\$0.00
02/21/13	02/25/13	WIZZ AIR 920WZZV59RFC BUDAPEST HUN	MT130560118000010171535	
		NAME: BACCIFAVA/MEDEA		
		CTY OF ORGN: BUD TRVL DT: 000000		
		CTY DEST: MXP SVC PRVDR: W6		
		FARE TYPE: Y STOPOVER:		
		Transaction Total		\$129.60
		Total Purchases For This Period		\$474.76
Fees				
Trans Date	Post Date	Description of Fees	Reference Number	Amount
02/22/13	02/22/13	LATE CHARGE ASSESSMENT	10000004110222999623940	\$25.00
		Total Fees for This Period		\$25.00
Interest Charged				
Description of Interest Charge				Amount
INTEREST CHARGE ON CASH ADVANCES				\$0.00
INTEREST CHARGE ON PURCHASES				\$165.36
INTEREST CHARGE ON BALANCE TRANSFERS				\$0.00
Total Interest For This Period				\$165.36
2013 Totals Year to Date				
Total fees charged in 2013			\$50.00	
Total interest charged in 2013			\$333.42	

Interest Charge CalculationYour **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$7,913.32	\$165.36
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement

Account Number 5451-9846-6573-9288

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From January 28, 2013 to February 25, 2013

HSBC PREMIER REWARDS Summary		
Previous Points	183,153	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.
Points	343	
Total Points	183,496	

Customer News
Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.

Customer News
Effective January 1, 2013, Price Protection coverage on your Premier World MasterCard® will be increasing from 60 days to 120 days from the date of purchase. Please call 1-800-MC-ASSIST to obtain full terms, conditions and exclusions that may apply.

HSBC PREMIER WORLD MASTERCARD

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HSBC Premier World MasterCard Account Statement
Account Number 5451-9846-6573-9288
From February 25, 2013 to March 28, 2013

Summary of Account Activity		
Previous Balance		\$8,292.59
Payments	-	\$600.00
Other Credits	-	\$0.00
Purchases/Debits	+	\$0.00
Balance Transfers	+	\$0.00
Cash Advances	+	\$0.00
Past Due Amount		\$0.00
Fees Charged	+	\$0.00
Interest Charged	+	\$189.52
New Balance		\$7,882.11
Revolving Credit Limit		\$11,500.00
Revolving Credit Available		\$3,617.89
Statement Closing Date		March 28, 2013
Days in Billing Cycle		31

Payment Information		
New Balance		\$7,882.11
Minimum Payment Due		\$269.00
Payment Due Date		April 22, 2013
Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	23 Years	\$24,202
\$323	3 Years	\$11,621 (Savings = \$12,581)
If you would like information about credit counseling services call 1-866-569-2227		

Questions?

24-Hour Customer Service
Lost or Stolen Card
Outside USA Collect
TDD/Hearing Impaired

1-888-662-4722
1-800-327-4214
1-716-841-6866
1-800-655-9392

Payment Address: HSBC Card Services, PO Box 5255, Carol Stream, IL 60197-5255

Billing Inquiries: HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029

Manage Your account online at www.HSBCPREMIERUSA.com

Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions				
Payments/Returns/Credits				
Trans Date	Post Date	Description of Transaction or Credit	Reference Number	Amount
03/19/13	03/19/13	PAYMENT BY PHONE - THANK YOU	65451983078196ZH3Z81DFK	-\$600.00
Total Payment For This Period				-\$600.00
Fees				
Trans Date	Post Date	Description of Fees	Reference Number	Amount
Total Fees For This Period				\$0.00
Interest Charged				
Description of Interest Charge				Amount
INTEREST CHARGE ON CASH ADVANCES				\$0.00
INTEREST CHARGE ON PURCHASES				\$189.52
INTEREST CHARGE ON BALANCE TRANSFERS				\$0.00
Total Interest For This Period				\$189.52

Detach and return bottom portion with your payment.

140850 4 27 0000000411

STMT66 D 8 506 PMEI

See reverse side for Important Information



Account Number: 5451-9846-6573-9288
New Balance \$7,882.11
Minimum Payment Due \$269.00
Payment Due Date 04/22/2013

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT ENCLOSED

ALI SADR
6445 ROCK FOREST DR
APT 209
BETHESDA MD 20817-8802

HSBC CARD SERVICES
PO BOX 5255
CAROL STREAM IL 60197-5255



00788211000269000005451984665739288001405



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From February 25, 2013 to March 28, 2013

Page 2 of 2

2013 Totals Year to Date	
Total fees charged in 2013	\$50.00
Total interest charged in 2013	\$522.94

Interest Charge Calculation

Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$8,191.88	\$189.52
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

HSBC PREMIER REWARDS Summary

Previous Points	183,498
Points	0
Total Points	183,498

Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.

Customer News

Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.

Customer News

Effective January 1, 2013, Price Protection coverage on your Premier World MasterCard® will be increasing from 60 days to 120 days from the date of purchase. Please call 1-800-MC-ASSIST to obtain full terms, conditions and exclusions that may apply.



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From March 28, 2013 to April 26, 2013

Page 1 of 2

Summary of Account Activity		
Previous Balance		\$7,882.11
Payments	-	\$7,882.11
Other Credits	-	\$0.00
Purchases/Debits	+	\$720.90
Balance Transfers	+	\$0.00
Cash Advances	+	\$0.00
Past Due Amount		\$0.00
Fees Charged	+	\$0.00
Interest Charged	+	\$0.00
New Balance		\$720.90
Revolving Credit Limit		\$11,500.00
Revolving Credit Available		\$10,779.10
Statement Closing Date		April 26, 2013
Days in Billing Cycle		29

Payment Information	
New Balance	\$720.90
Minimum Payment Due	\$25.00
Payment Due Date	May 22, 2013

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	4 Years	\$1,183
\$30	3 Years	\$1,063 (Savings = \$120)

If you would like information about credit counseling services call 1-866-569-2227.

Questions?

24-Hour Customer Service
 Lost or Stolen Card
 Outside USA Collect
 TDD/Hearing Impaired

1-888-662-4722
 1-800-327-4214
 1-716-841-6866
 1-800-655-9392

Payment Address: HSBC Card Services, PO Box 5255, Carol Stream, IL 60197-5255

Billing Inquiries: HSBC Card Services, PO Box 80029, Sulina, CA 93912-0029

Manage Your account online at www.HSBCEPREMIERUSA.com

Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Payments/Returns/Credits					
Trans Date	Post Date	Description of Transaction or Credit	Reference Number	Amount	
04/05/13	04/05/13	PAYMENT - THANK YOU	65451983095010NC1DQK0D7	-\$7,882.11	
Total Payment For This Period				-\$7,882.11	
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
04/08/13	04/10/13	J CHOWS - MONTGOMERY M BETHESDA MD		MT131000117000010154259	\$16.41
04/09/13	04/11/13	STARBUCKS NJ-T10911501 MILLTOWN NJ		MT131010116000010151008	\$4.49
04/09/13	04/11/13	ANNAPOLIS SAILING SCHO 800-6389192 MD		MT131010117000010079875	\$700.00
Total Purchases For This Period				\$720.90	
Fees					
Trans Date	Post Date	Description of Fees	Reference Number	Amount	
Total Fees For This Period				\$0.00	

Detach and return bottom portion with your payment.

140850 4 27 0000000411

STMT66 D 8 939 FME1

See reverse side for Important Information



Account Number: 5451-9846-6573-9288
 New Balance \$720.90
 Minimum Payment Due \$25.00
 Payment Due Date 05/22/2013

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140

AMOUNT
 ENCLOSED

ALI SADR
 6445 ROCK FOREST DR
 APT 209
 BETHESDA MD 20817-8802

HSBC CARD SERVICES
 PO BOX 5255
 CAROL STREAM IL 60197-5255



00072090000025000005451984665739288001404



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From March 28, 2013 to April 26, 2013

Page 2 of 2

Interest Charged	
Description of Interest Charge	Amount
INTEREST CHARGE ON CASH ADVANCES	\$0.00
INTEREST CHARGE ON PURCHASES	\$0.00
INTEREST CHARGE ON BALANCE TRANSFERS	\$0.00
Total Interest For This Period	\$0.00

2013 Totals Year to Date	
Total fees charged in 2013	\$50.00
Total interest charged in 2013	\$522.94

Interest Charge Calculation			
Your Annual Percentage Rate (APR) is the annual interest rate on your account.			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$0.00	\$0.00
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00
v=Variable Rate			

HSBC PREMIER REWARDS Summary		
Previous Points	183,498	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.
Points	720	
Total Points	184,218	

Customer News	
Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.	



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From April 26, 2013 to May 28, 2013

Page 1 of 2

Summary of Account Activity		
Previous Balance		\$720.90
Payments	-	\$0.00
Other Credits	-	\$0.00
Purchases/Debits	+	\$73.72
Balance Transfers	+	\$0.00
Cash Advances	+	\$0.00
Past Due Amount		\$25.00
Fees Charged	+	\$25.00
Interest Charged	+	\$19.30
New Balance		\$838.92
Revolving Credit Limit		\$11,500.00
Revolving Credit Available		\$10,661.08
Statement Closing Date		May 28, 2013
Days in Billing Cycle		32

Payment Information	
New Balance	\$838.92
Minimum Payment Due	\$78.00
Payment Due Date	June 22, 2013

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 29.99%.

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	5 Years	\$1,444
\$34	3 Years	\$1,237 (Savings = \$207)

If you would like information about credit counseling services call 1-866-569-2227.

Questions?

24-Hour Customer Service
 Lost or Stolen Card
 Outside USA Collect
 TDD/Hearing Impaired

1-888-662-4722
 1-800-327-4214
 1-716-841-6866
 1-800-655-9392

Payment Address: HSBC Card Services, PO Box 5255, Carol Stream, IL 60197-5255

Billing Inquiries: HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029

Manage Your account online at www.HSBCPREMIERUSA.com

Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
04/27/13	04/29/13	CAPTAIN'S MARKET CABIN JOHN MD		MT131190114000010603720	\$19.71
04/27/13	04/29/13	MY SUSHI CABIN JOHN MD		MT131190114000010614224	\$48.06
04/30/13	05/02/13	DC PARKING METERS WASHINGTON DC		MT131220119000010176082	\$4.00
05/08/13	05/09/13	KARBUD GIDA ISTANBUL TUR		MT131290116000010166743	\$1.95
	05/08/13	3.50 TRY			
Total Purchases For This Period					\$73.72
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount
05/22/13	05/22/13	LATE CHARGE ASSESSMENT		10000004110522999531950	\$25.00
Total Fees for This Period					\$25.00
Interest Charged					
Description of Interest Charge					Amount
INTEREST CHARGE ON CASH ADVANCES					\$0.00

Detach and return bottom portion with your payment.

140850 4 27 0000000411 STMT66 D 8 520 PME1

See reverse side for Important Information



Account Number: 5451-9846-6573-9288
 New Balance \$838.92
 Minimum Payment Due \$78.00
 Payment Due Date 06/22/2013

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT
 ENCLOSED

ALI SADR
 6445 ROCK FOREST DR
 APT 209
 BETHESDA MD 20817-8802

HSBC CARD SERVICES
 PO BOX 5255
 CAROL STREAM IL 60197-5255



00083892000078000005451984665739288001400



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6373-9288
 From April 26, 2013 to May 28, 2013

Page 2 of 2

INTEREST CHARGE ON PURCHASES	\$19.30						
INTEREST CHARGE ON BALANCE TRANSFERS	\$0.00						
Total Interest For This Period	\$19.30						
<table border="1"> <thead> <tr> <th colspan="2">2013 Totals Year to Date</th></tr> </thead> <tbody> <tr> <td>Total fees charged in 2013</td><td>\$75.00</td></tr> <tr> <td>Total interest charged in 2013</td><td>\$542.24</td></tr> </tbody> </table>		2013 Totals Year to Date		Total fees charged in 2013	\$75.00	Total interest charged in 2013	\$542.24
2013 Totals Year to Date							
Total fees charged in 2013	\$75.00						
Total interest charged in 2013	\$542.24						

Interest Charge Calculation

Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$808.29	\$19.30
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

HSBC PREMIER REWARDS Summary

Previous Points	184,218
Points	74
Total Points	184,292

Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.

Customer News

Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.

Customer News

As a valued Premier client, **Concierge Services** will now be part of your HSBC Premier World MasterCard®. The MasterCard Concierge can make your dinner reservations, purchase tickets to events, and much more. The cost of goods or services can be billed to your HSBC Premier World MasterCard®. To learn more, call **1-888-314-5132**.



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From May 28, 2013 to June 27, 2013

Page 1 of 2

Summary of Account Activity		
Previous Balance		\$838.92
Payments	-	\$0.00
Other Credits	-	\$0.00
Purchases/Debits	+	\$669.33
Balance Transfers	+	\$0.00
Cash Advances	+	\$0.00
Past Due Amount		\$78.00
Fees Charged	+	\$25.00
Interest Charged	+	\$20.92
New Balance		\$1,554.17
Revolving Credit Limit		\$11,500.00
Revolving Credit Available		\$0.00
Statement Closing Date		June 27, 2013
Days in Billing Cycle		30

Payment Information	
New Balance	\$1,554.17
Minimum Payment Due	\$140.00
Payment Due Date	July 22, 2013

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 29.99%.

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about ..	And you will end up paying an estimated total of...
Only the minimum Payment	10 Years	\$3,658
\$64	3 Years	\$2,291 (Savings = \$1,367)

If you would like information about credit counseling services call 1-866-569-2227.

Questions?

24-Hour Customer Service
 Lost or Stolen Card
 Outside USA Collect
 TDD/Hearing Impaired

1-888-662-4722
 1-800-327-4214
 1-716-841-6866
 1-800-655-9392

Payment Address: HSBC Card Services, PO Box 5255, Carol Stream, IL 60197-5255

Billing Inquiries: HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029

Manage Your account online at www.HSBCPREMIERUSA.com

Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
06/22/13	06/24/13	STARBUCKS BAGG10561538 DULLES VA		MT131750114000010560180	\$3.47
06/22/13	06/24/13	STARBUCKS #00747 BETHE Bethesda MD		MT131750114000010576228	\$3.45
06/22/13	06/24/13	CVS PHARMACY #1475 Q03 BETHESDA MD		MT131750114000010587704	\$59.28
06/22/13	06/24/13	WALGREENS #11123 POTOMAC MD		MT131750114000010589408	\$9.99
06/24/13	06/25/13	JOHN EDWARD KELLY MD P ROCKVILLE MD		MT131760119000010184159	\$155.00
06/24/13	06/25/13	HUDSON TRAIL OUTFITTER WASHINGTON DC		MT131760127000010132925	\$41.34
06/25/13	06/26/13	COLONIAL PARKING # QPS WASHINGTON DC		MT131770125000010145394	\$7.00
06/25/13	06/27/13	SUNOCO 0175100700 ROCKVILLE MD		MT131780116000010056084	\$21.25
06/25/13	06/27/13	HERTZ RENT-A-CAR WASHINGTON DC		MT131780116000010059877	

Detach and return bottom portion with your payment.

140830 5 A 27 0000000411

STMT66 D 8 1199 PMEI

See reverse side for Important Information



Account Number: 5451-9846-6573-9288
 New Balance \$1,554.17
 Minimum Payment Due \$140.00
 Payment Due Date 07/22/2013

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140

AMOUNT
 ENCLOSED

ALI SADR
 6445 ROCK FOREST DR APT 209
 BETHESDA MD 20817-8802

HSBC CARD SERVICES
 PO BOX 5255
 CAROL STREAM IL 60197-5255



00155417000140000005451984665739288001406



HSBC PREMIER WORLD MASTERCARD

 HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From May 28, 2013 to June 27, 2013

Page 2 of 2

		AGRMNT#: 126608031 CK OUT DT: 062213		
		RTRN LOC: ROCKVILLE MD		
		RTRN DT: 062513 MRCH PH: 8006544173		
		SADR /ALI		
		Transaction Total		\$91.05
06/25/13	06/27/13	WASHINGTON FLYING C	MT131780117000010190097	\$277.50
		GAITHERSBURG MD		
		Total Purchases For This Period		\$669.33
Fees				
Trans Date	Post Date	Description of Fees	Reference Number	Amount
06/22/13	06/22/13	LATE CHARGE ASSESSMENT	10000004110622999513260	\$25.00
		Total Fees for This Period		\$25.00
Interest Charged				
Description of Interest Charge				Amount
INTEREST CHARGE ON CASH ADVANCES				\$0.00
INTEREST CHARGE ON PURCHASES				\$20.92
INTEREST CHARGE ON BALANCE TRANSFERS				\$0.00
Total Interest For This Period				\$20.92
2013 Totals Year to Date				
Total fees charged in 2013			\$100.00	
Total interest charged in 2013			\$563.16	

Interest Charge CalculationYour **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$934.25	\$20.92
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

HSBC PREMIER REWARDS Summary

Previous Points	184,292
Points	278
Total Points	184,570

Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.

Customer News

Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement
Account Number 5451-9846-6573-9288
From June 27, 2013 to July 28, 2013

Page 1 of 3

Summary of Account Activity		
Previous Balance		\$1,554.17
Payments	-	\$838.92
Other Credits	-	\$206.29
Purchases/Debits	+	\$2,832.60
Balance Transfers	+	\$0.00
Cash Advances	+	\$0.00
Past Due Amount		\$0.00
Fees Charged	+	\$0.00
Interest Charged	+	\$67.62
New Balance		\$3,409.18
Revolving Credit Limit		\$11,500.00
Revolving Credit Available		\$8,090.82
Statement Closing Date		July 28, 2013
Days in Billing Cycle		31

Payment Information	
New Balance	\$3,409.18
Minimum Payment Due	\$102.00
Payment Due Date	August 22, 2013

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 29.99%.

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	17 Years	\$9,853
\$140	3 Years	\$5,026 (Savings = \$4,827)

If you would like information about credit counseling services call
1-866-569-2227

Questions?

24-Hour Customer Service
Lost or Stolen Card
Outside USA Collect
TDD/Hearing Impaired

1-888-662-4722
1-800-327-4214
1-716-841-6866
1-800-655-9392

Payment Address: HSBC Card Services, PO Box 5255, Carol Stream, IL 60197-5255

Billing Inquiries: HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029

Manage Your account online at www.HSBCPREMIERUSA.com

Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions						
Payments/Returns/Credits						
Trans Date	Post Date	Description of Transaction or Credit		Reference Number	Amount	
06/28/13	06/29/13	PAYMENT THANK YOU		45451983180025973268633	-\$838.92	
07/02/13	07/03/13	NATIONAL CAR RENTAL ATLANTA GA		MT131840118000010185305	-\$206.29	
Total Payment For This Period					-\$1,045.21	
Purchases/Debits						
Trans Date	Post Date	Description of Transaction or Credit		Purchase Type	Reference Number	Amount
06/26/13	06/28/13	DC PARKING METERS	WASHINGTON DC		MT131790116000010180174	\$2.00
06/27/13	06/28/13	EXXONMOBIL 47848643	VIENNA VA		MT131790123000010142906	\$72.00
06/27/13	06/29/13	PF CHANGS #3000	MCLEAN VA		MT131800114000010153146	\$104.57
06/27/13	06/29/13	MONTBLANC TYSONS 21	MCLEAN VA		MT131800114000010158092	\$435.75
06/27/13	06/29/13	J CREW RETAIL #793	MCLEAN VA		MT131800116000010184005	\$281.40
06/28/13	06/29/13	PUBLIX #569	DACULA GA		MT131800120000010140638	\$35.37
06/29/13	07/01/13	FEDEXOFFICE 00008268	BUFORD GA		MT131820114000010527264	\$3.69

Detach and return bottom portion with your payment.

J40830 3 27 0000000411

STMT66 D 8 1198 PMEI

See reverse side for important information



Account Number: 5451-9846-6573-9288
New Balance \$3,409.18
Minimum Payment Due \$102.00
Payment Due Date 08/22/2013

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT
ENCLOSED

ALI SADR
6445 ROCK FOREST DR APT 209
BETHESDA MD 20817-8802

HSBC CARD SERVICES
PO BOX 5255
CAROL STREAM IL 60197-5255



00340918000102000005451984665739288001409



HSBC PREMIER WORLD MASTERCARD

 HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From June 27, 2013 to July 28, 2013

Page 2 of 3

06/29/13	07/01/13	PUBLIX #569 DACULA GA	MT131820114000010549652	\$112.69
06/30/13	07/02/13	DELTA00601756745760 ATLANTA TUR	MT131830115000010081684	
		NAME: PHILLIPS/MARYBE CTY OF ORGN: LAX TRVL DT: 063013 CTY DEST: LAX SVC PRVDR: DL FARE TYPE: STOPOVER:		
		Transaction Total		\$29.63
		06/30/13 57.00 TRY NAME: PHILLIPS/MARYBE CTY OF ORGN: LAX TRVL DT: 063013 CTY DEST: LAX SVC PRVDR: DL FARE TYPE: STOPOVER:		
		Transaction Total		\$0.00
06/30/13	07/02/13	WASHINGTON FLYING C GAITHERSBURG MD	MT131830116000010196485	\$198.00
07/01/13	07/02/13	NATIONAL CAR RENTAL ATLANTA GA	MT131830116000010175034	
		AGRMNT#: 324030177 CK OUT DT: 062813 RTRN LOC: COLLEGE PARK GA RTRN DT: 070113 MRCH PH: 8004683334 SADR ALI		
		Transaction Total		\$206.29
07/01/13	07/03/13	SHELL OIL 216852204QPS HAPEVILLE GA	MT131840116000010149382	\$31.38
07/02/13	07/03/13	NATIONAL CAR RENTAL ATLANTA GA	MT131840118000010185304	
		AGRMNT#: 324030113 CK OUT DT: 062813 RTRN LOC: COLLEGE PARK GA RTRN DT: 070113 MRCH PH: 8004683334 SADR ALI		
		Transaction Total		\$524.96
07/02/13	07/03/13	COLUMBIA EYE ASSOCIATE WASHINGTON DC	MT131840126000010146706	\$240.00
07/03/13	07/04/13	LEBANESE TAVERNA TYSON MCLEAN VA	MT131850117000010196538	\$36.74
07/04/13	07/06/13	COLONIAL PARKING #6QPS CHEVY CHASE MD	MT131870116000010122992	\$3.00
07/17/13	07/18/13	MALATA RESTAURANT VALLETTA MLT	MT131990127000010035368	\$129.98
		07/17/13 98,65 EUR		
07/18/13	07/18/13	MALATA RESTAURANT VALLETTA MLT	MT131990127000010035367	\$26.35
		07/18/13 20,00 EUR		
07/18/13	07/19/13	BAR SATELLITE PANE 249 GALLARATE ITA	MT132000119000010063115	\$5.64
		07/18/13 4,30 EUR		
07/18/13	07/19/13	BAR SATELLITE MALP 903 FERNO ITA	MT132000119000010063122	\$9.71



HSBC PREMIER WORLD MASTERCARD

 HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From June 27, 2013 to July 28, 2013

Page 3 of 3

07/18/13	07/19/13	07/18/13 7,40 EUR THE WESTIN DRAGONARA ST JULIANS MLT	MT132000127000010038451	\$143.29
07/18/13	07/20/13	07/18/13 109,20 EUR MARISCO NA DOCA LDA LISBOA PRT	MT132010115000010027819	\$184.76
07/19/13	07/20/13	07/18/13 140,50 EUR PLATEPASS HERTZ TOLLS 8774114300 AZ	MT132010120000010045166	\$15.40
Total Purchases For This Period				\$2,832.60
Fees				
Trans Date	Post Date	Description of Fees	Reference Number	Amount
Total Fees For This Period				\$0.00
Interest Charged				
Description of Interest Charge				Amount
INTEREST CHARGE ON CASH ADVANCES				\$0.00
INTEREST CHARGE ON PURCHASES				\$67.62
INTEREST CHARGE ON BALANCE TRANSFERS				\$0.00
Total Interest For This Period				\$67.62
2013 Totals Year to Date				
Total fees charged in 2013			\$100.00	
Total interest charged in 2013			\$630.78	

Interest Charge CalculationYour **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$2,922.85	\$67.62
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

HSBC PREMIER-REWARDS Summary

Previous Points	184,570
Points	2,627
Total Points	187,197

Travel on your term a HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.

Customer News

Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From July 28, 2013 to August 28, 2013

Page 1 of 2

Summary of Account Activity		
Previous Balance		\$3,409.18
Payments	-	\$0.00
Other Credits	-	\$0.00
Purchases/Debits	+	\$15.00
Balance Transfers	+	\$0.00
Cash Advances	+	\$0.00
Past Due Amount		\$102.00
Fees Charged	+	\$25.00
Interest Charged	+	\$80.24
New Balance		\$3,529.42
Revolving Credit Limit		\$11,500.00
Revolving Credit Available		\$7,970.58
Statement Closing Date		August 28, 2013
Days in Billing Cycle		31

Payment Information	
New Balance	\$3,529.42
Minimum Payment Due	\$243.00
Payment Due Date	September 22, 2013

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	17 Years	\$9,930
\$145	3 Years	\$5,203 (Savings = \$4,727)

If you would like information about credit counseling services call
 1-866-569-2227

Questions?

24-Hour Customer Service
 Lost or Stolen Card
 Outside USA Collect
 TDD/Hearing Impaired

1-888-662-4722
 1-800-327-4214
 1-716-841-6866
 1-800-655-9392

Payment Address: HSBC Card Services, PO Box 5255, Carol Stream, IL 60197-5255

Billing Inquiries: HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029

Manage Your account online at www.HSBCPREMIERUSA.com

Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
07/29/13	07/31/13	NOTARY COMM AND AUTH S WASHINGTON DC		MT132120116000010062643	\$15.00
Total Purchases For This Period					\$15.00
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount
08/22/13	08/22/13	LATE CHARGE ASSESSMENT		10000004110822999843000	\$25.00
Total Fees for This Period					\$25.00
Interest Charged					
Description of Interest Charge					Amount
INTEREST CHARGE ON CASH ADVANCES					\$0.00
INTEREST CHARGE ON PURCHASES					\$80.24
INTEREST CHARGE ON BALANCE TRANSFERS					\$0.00
Total Interest For This Period					\$80.24

Detach and return bottom portion with your payment.

140850 5 27 0000000411

STMT66 D 8 1172 PME1

See reverse side for Important Information



Account Number: 5451-9846-6573-9288
 New Balance \$3,529.42
 Minimum Payment Due \$243.00
 Payment Due Date 09/22/2013

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT
 ENCLOSED

ALI SADR
 6445 ROCK FOREST DR APT 209
 BETHESDA MD 20817-8802

HSBC CARD SERVICES
 PO BOX 5255
 CAROL STREAM IL 60197-5255



00352942000243000005451984665739288001406



HSBC PREMIER WORLD MASTERCARD

 HSBC Premier World MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From July 28, 2013 to August 28, 2013

Page 2 of 2

2013 Totals Year to Date	
Total fees charged in 2013	\$125.00
Total interest charged in 2013	\$711.02

Interest Charge Calculation			
Your Annual Percentage Rate (APR) is the annual interest rate on your account.			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$3,447.61	\$79.76
PURCHASES 00001	27.24% (v)	\$20.82	\$0.48
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00
v=Variable Rate			

HSBC PREMIER REWARDS Summary		
Previous Points	187,197	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.
Points	15	
Total Points	187,212	

Customer News	
Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.	



MasterCard

Page 1 of 2

 MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From August 28, 2013 to October 2, 2013

Summary of Account Activity		
Previous Balance		\$3,529.42
Payments	-	\$0.00
Other Credits	-	\$0.00
Purchases/Debits	+	\$0.00
Balance Transfers	+	\$0.00
Cash Advances	+	\$0.00
Past Due Amount		\$243.00
Fees Charged	+	\$25.00
Interest Charged	+	\$0.00
New Balance		\$3,554.42
Credit Limit		\$11,500.00
Credit Available		\$0.00
Statement Closing Date		October 2, 2013
Days in Billing Cycle		35

Payment Information		
New Balance		\$3,554.42
Minimum Payment Due		\$304.00
Payment Due Date		October 22, 2013
Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00.		
Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	16 Years	\$9,873
\$146	3 Years	\$5,240 (Savings = \$4,633)
If you would like information about credit counseling services call 1-866-569-2227.		

Questions?
 24-Hour Customer Service
 Lost or Stolen Card
 Outside USA Collect
 TDD/Hearing Impaired

 1-888-385-8916
 1-800-441-0604
 1-716-841-7141
 1-800-655-9392

Payment Address: HSBC Bank USA N.A., PO Box 5255, Carol Stream, IL 60197-5255
Billing Inquiries: HSBC Bank USA N.A., PO Box 80026, Salinas, CA 93912-0026
Manage Your account online at www.us.hsbc.com
Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount
09/22/13	09/22/13	LATE CHARGE ASSESSMENT		10000004110921999842950	\$25.00
Total Fees for This Period					\$25.00
Interest Charged					
Description of Interest Charge					Amount
INTEREST CHARGE ON CASH ADVANCES					\$0.00
INTEREST CHARGE ON PURCHASES					\$0.00
INTEREST CHARGE ON BALANCE TRANSFERS					\$0.00
Total Interest For This Period					\$0.00
2013 Totals Year to Date					
Total fees charged in 2013			\$150.00		
Total interest charged in 2013			\$711.02		

Detach and return bottom portion with your payment.

1409975 U 27 0600000411

STMTX6 E 8 22230 EXCPT

See reverse side for Important Information


 Account Number: 5451-9846-6573-9288
 New Balance \$3,554.42
 Minimum Payment Due \$304.00
 Payment Due Date 10/22/2013

Include account number on check to HSBC Bank USA N.A.. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140

 AMOUNT
 ENCLOSED

 ALI SADR
 6445 ROCK FOREST DR APT 209
 BETHESDA MD 20817-8802

 HSBC BANK USA N A
 PO BOX 5255
 CAROL STREAM IL 60197-5255


00355442000304000005451984665739288001403



MasterCard

Page 2 of 2

MasterCard Account Statement
Account Number 5451-9846-6573-9288
From August 28, 2013 to October 2, 2013**Interest Charge Calculation**Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$0.00	\$0.00
PURCHASES 00001	27.24% (v)	\$0.00	\$0.00
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate



MasterCard

Page 1 of 2

 MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From October 2, 2013 to October 28, 2013

Summary of Account Activity		
Previous Balance		\$3,554.42
Payments		\$3,554.42
Other Credits	-	\$0.00
Purchases/Debits	+	\$0.00
Balance Transfers	+	\$0.00
Cash Advances	+	\$0.00
Past Due Amount		\$0.00
Fees Charged	+	\$0.00
Interest Charged	+	\$0.00
New Balance		\$0.00
Credit Limit		\$11,500.00
Credit Available		\$0.00
Statement Closing Date		October 28, 2013
Days in Billing Cycle		26

Payment Information	
New Balance	\$0.00
Minimum Payment Due	\$0.00
Payment Due Date	November 22, 2013
Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00.	

Questions?
 24-Hour Customer Service
 Lost or Stolen Card
 Outside USA Collect
 TDD/Hearing Impaired

 1-888-385-8916
 1-800-441-0604
 1-716-841-7141
 1-800-655-9392

Payment Address: HSBC Bank USA N.A., PO Box 5255, Carol Stream, IL 60197-5255

Billing Inquiries: HSBC Bank USA N.A., PO Box 80026, Salinas, CA 93912-0026

Manage Your account online at www.us.hsbc.com
Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions				
Payments/Returns/Credits				
Trans Date	Post Date	Description of Transaction or Credit	Reference Number	Amount
10/03/13	10/03/13	CONV CRED ADJ	09999999981003003932100	-\$3,554.42
Total Payment For This Period				-\$3,554.42
Fees				
Trans Date	Post Date	Description of Fees	Reference Number	Amount
Total Fees For This Period				\$0.00
Interest Charged				
Description of Interest Charge				Amount
INTEREST CHARGE ON CASH ADVANCES				\$0.00
INTEREST CHARGE ON PURCHASES				\$0.00
INTEREST CHARGE ON BALANCE TRANSFERS				\$0.00
Total Interest For This Period				\$0.00
2013 Totals Year to Date				
Total fees charged in 2013			\$150.00	
Total interest charged in 2013			\$711.02	

Detach and return bottom portion with your payment.

140997 5 U 27 0000000411

STMTX6 E 8 8311 EXCPT

See reverse side for important information


 Account Number: 5451-9846-6573-9288
 New Balance \$0.00
 Minimum Payment Due \$0.00
 Payment Due Date 11/22/2013

Include account number on check to HSBC Bank USA N.A. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140

 AMOUNT
 ENCLOSED

 ALI SADR
 6445 ROCK FOREST DR APT 209
 BETHESDA MD 20817-8802

 HSBC BANK USA N.A.
 PO BOX 5255
 CAROL STREAM IL 60197-5255


0000000000000000005451984665739288001401



MasterCard

Page 2 of 2

 MasterCard Account Statement
 Account Number 5451-9846-6573-9288
 From October 2, 2013 to October 28, 2013

Interest Charge Calculation			
Your Annual Percentage Rate (APR) is the annual interest rate on your account.			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$0.00	\$0.00
PURCHASES 00001	27.24% (v)	\$0.00	\$0.00
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00
v=Variable Rate			

EXHIBIT 28-7

2010-2014

Date	From	To	Source
8/12/2010	Dubai, United Arab Emirates	Tehran, Iran	Email - Electronic Ticket (GX2202)
11/11/2010	Tehran, Iran	Istanbul, Turkey	Email - Electronic Ticket (GX2222)
11/12/2010	Istanbul, Turkey	Tehran, Iran	Email - Electronic Ticket (GX2222)
11/15/2010	Tehran, Iran	Istanbul, Turkey	Email - Electronic Ticket (GX2227)
12/11/2010	Istanbul, Turkey	Tehran, Iran	Email - Electronic Ticket (GX2235)
12/15/2010	Istanbul, Turkey	Tehran, Iran	Email - Electronic Ticket (GX2227)
2/8/2011	London, UK	Tehran, Iran	Email - Electronic Ticket (GX2010)
2/17/2011	Tehran, Iran	Dubai, United Arab Emirates	Email - Electronic Ticket (GX2012)
2/17/2011	Dubai, United Arab Emirates	Tehran, Iran	Email - Electronic Ticket (GX2013)
2/19/2011	Dubai, United Arab Emirates	Tehran, Iran	Email - Electronic Ticket (GX2012)
2/21/2011	Frankfurt, Germany	Tehran, Iran	Email - Electronic Ticket (GX2209)
4/26/2011	Tehran, Iran	Dubai, United Arab Emirates	Email - Electronic Ticket (GX2029)
4/30/2011	Dubai, United Arab Emirates	Tehran, Iran	Email - Electronic Ticket (GX2029)
5/4/2011	Istanbul, Turkey	Tehran, Iran	Email - Electronic Ticket (GX2035)
5/14/2011	Dubai, United Arab Emirates	Tehran, Iran	Email - Electronic Ticket (GX2039)
5/18/2011	Tehran, Iran	Frankfurt, Germany	Email - Electronic Ticket (GX1104)
5/31/2011	Tehran, Iran	Frankfurt, Germany	Email - Electronic Ticket (GX1105)
6/19/2011	Frankfurt, Germany	Tehran, Iran	Email - Electronic Ticket (GX1104)
6/24/2011	Istanbul, Turkey	Tehran, Iran	Email - Electronic Ticket (GX2045)
6/28/2011	Tehran, Iran	Frankfurt, Germany	Email - Electronic Ticket (GX1106)
7/17/2011	Istanbul, Turkey	Tehran, Iran	Email - Electronic Ticket (GX2053)
7/31/2011	Frankfurt, Germany	Tehran, Iran	Email - Electronic Ticket (GX1105)
8/28/2011	Frankfurt, Germany	Tehran, Iran	Email - Electronic Ticket (GX1106)
9/17/2011	Istanbul, Turkey	Tehran, Iran	Email - Electronic Ticket (GX2067)
9/19/2011	Tehran, Iran	Frankfurt, Germany	Email - Electronic Ticket (GX1107)
9/28/2011	Frankfurt, Germany	Tehran, Iran	Email - Electronic Ticket (GX1107)
10/10/2011	Tehran, Iran	Frankfurt, Germany	Email - Electronic Ticket (GX1108)

2010-2014

Date	From	To	Source
10/11/2011	Tehran, Iran	Istanbul, Turkey	Email - Electronic Ticket (GX1109)
10/11/2011	Frankfurt, Germany	Tehran, Iran	Email - Electronic Ticket (GX1108)
10/12/2011	Istanbul, Turkey	Tehran, Iran	Email - Electronic Ticket (GX1109)
10/13/2011	Tehran, Iran	Vienna, Austria	Email - Electronic Ticket (GX1110)
10/14/2011	Vienna, Austria	Tehran, Iran	Email - Electronic Ticket (GX1110)
11/10/2011	Istanbul, Turkey	Tehran, Iran	Email - Electronic Ticket (GX2079)
12/2/2011	Tehran, Iran	Istanbul, Turkey	Email - Electronic Ticket (GX2085)
12/10/2011	Istanbul, Turkey	Tehran, Iran	Email - Electronic Ticket (GX2085)
4/10/2012		Tehran, Iran	Passport P95427954 (GX205A-T)
4/11/2012	Tehran, Iran		Passport P95427954 (GX205A-T)
5/9/2012		Tehran, Iran	Passport P95427954 (GX205A-T)
5/14/2012	Tehran, Iran		Passport P95427954 (GX205A-T)
2/9/2014		Tehran, Iran	Passport H95647761 (GX206A-T)
2/12/2014	Tehran, Iran		Passport H95647761 (GX206A-T)
10/8/2014		Tehran, Iran	Passport H95647761 (GX206A-T)
10/10/2014	Tehran, Iran		Passport H95647761 (GX206A-T)
12/13/2014		Tehran, Iran	Passport H95647761 (GX206A-T)
12/15/2014	Tehran, Iran		Passport H95647761 (GX206A-T)

EXHIBIT 28-8

Clarity Fund Transfers via Stratus Global Investments Nov 24, 2011 - Dec 12, 2011								
	DATE	ORIGINATING PARTY	INTERMEDIARY PARTY	BENEFICIARY PARTY	CITY	COUNTRY	STATED PURPOSE	AMOUNT (USD)
1	November 24, 2011	Clarity	Stratus Global Investments	GFH Short Interest Private Fund, Inc	Panama City	Panama	Exchange of funds for Client 0045-7	\$ 241,650.00
2	November 24, 2011	Clarity	Stratus Global Investments	GFH Short Interest Private Fund, Inc	Panama City	Panama	Exchange of funds for Client 0045-7	\$ 238,155.00
3	November 24, 2011	Clarity	Stratus Global Investments	Flores-Hidalgo Sociedades e Inversiones, S.L.	Barcelona	Spain	Exchange of funds	\$ 439,150.50
4	November 25, 2011	Clarity	Stratus Global Investments	Apolo Zona Libre	Panama City	Panama	Legal Fees-Claims Management-IPC19	\$ 150,000.00
5	November 25, 2011	Clarity	Stratus Global Investments	Samuel Carciente Sananes	Panama City	Panama	Legal Fees-Claims Management-IPC20	\$ 100,000.00
6	November 25, 2011	Clarity	Stratus Global Investments	Senzani International C.A.	Willestamstad	Curacao	Legal Fees-Claims Management-IPC21	\$ 100,000.00
7	November 25, 2011	Clarity	Stratus Global Investments	Maruja Ayala de Morales	Los Angeles (CA)	USA	Legal Fees-Claims Management-IPC22	\$ 100,000.00
8	November 25, 2011	Clarity	Stratus Global Investments	Kam Pong Cheung	Enping	China	Legal Fees-Claims Management-IPC23	\$ 100,000.00
9	November 25, 2011	Clarity	Stratus Global Investments	Agustin Gonzalez	Maracay	Venezuela	Legal Fees-Claims Management-IPC24	\$ 70,000.00
10	November 28, 2011	Clarity	Stratus Global Investments	Healy Consultants (Hong Kong) Limited	Hong Kong	China	Establishment fee of the company "Perse VIP"	\$ 4,800.00
11	December 1, 2011	Clarity	Stratus Global Investments	America Economia 2021, C.A	Panama City	Panama	Doors for Venezuela Project	\$ 200,000.00
12	December 1, 2011	Clarity	Stratus Global Investments	Corporacion Corriager C.A. LLC	Miami (FL)	USA	Equipment for trucks / Venezuela Project	\$ 220,000.00
13	December 1, 2011	Clarity	Stratus Global Investments	Profit Finacial INC	Panama City	Panama	Bricks for Venezuela Project	\$ 178,550.00
14	December 1, 2011	Clarity	Stratus Global Investments	Lennox Parts LLC	Doral (FL)	USA	Spare parts for vehicles for Venezuela Project	\$ 300,000.00
15	December 1, 2011	Clarity	Stratus Global Investments	Tania Dos Santos	Weston (FL)	USA	Legal Fees-Claims Management-IPC25	\$ 100,000.00
16	December 1, 2011	Clarity	Stratus Global Investments	Venezolana de Control Intermodal, C.A.	Caracas	Venezuela	Legal Fees-Claims Management-IPC26	\$ 500,000.00
17	December 1, 2011	Clarity	Stratus Global Investments	Pablo Alejandro Fernandes Martins	Weston (FL)	USA	Legal Fees-Claims Management-IPC27	\$ 150,000.00
18	December 1, 2011	Clarity	Stratus Global Investments	Virginland Technology Co. Limited	Guangzhou	China	Legal Fees-Claims Management-IPC28	\$ 40,000.00

19	December 1, 2011	Clarity	Stratus Global Investments	Pablo Fernandes	Weston (FL)	USA	Legal Fees-Claims Management-IPC29	\$ 90,000.00
20	December 1, 2011	Clarity	Stratus Global Investments	Games Plus Electronic C.A.	Caracas	Venezuela	Legal Fees-Claims Management-IPC30	\$ 100,000.00
21	December 1, 2011	Clarity	Stratus Global Investments	1. Totalbank Curacao N.V. 2. Inversiones Keromuchi CA	Willestamstad	Curacao	Legal Fees-Claims Management-IPC31	\$ 100,000.00
22	December 1, 2011	Clarity	Stratus Global Investments	Irene Vianello	Caracas	Venezuela	Legal Fees-Claims Management-IPC32	\$ 126,000.00
23	December 1, 2011	Clarity	Stratus Global Investments	Jumbo Zona Libre, S.A	Colon	Panama	Legal Fees-Claims Management-IPC33	\$ 103,642.00
24	December 1, 2011	Clarity	Stratus Global Investments	1. Banesco S.A. 2. Inversiones A.M. Canaima C.A	Panama City	Panama	Legal Fees-Claims Management-IPC34	\$ 115,507.00
25	December 1, 2011	Clarity	Stratus Global Investments	Jumbo Zona Libre, S.A	Colon	Panama	Legal Fees-Claims Management-IPC35	\$ 96,358.00
26	December 1, 2011	Clarity	Stratus Global Investments	Global Morgan Group (HK) Limited	Hong Kong	China	Legal Fees-Claims Management-IPC36	\$ 115,000.00
27	December 1, 2011	Clarity	Stratus Global Investments	Fernando Padron	Caracas	Venezuela	Legal Fees-Claims Management-IPC37	\$ 28,500.00
28	December 6, 2011	Clarity	Stratus Global Investments	Ricardo Antonio Fernandes Sarrico	Aveiro	Portugal	Legal Fees-Claims Management-IPC38	\$ 145,000.00
29	December 6, 2011	Clarity	Stratus Global Investments	Franca Cravino	Varazze	Italy	Legal Fees-Claims Management-IPC39	\$ 55,000.00
30	December 6, 2011	Clarity	Stratus Global Investments	Vincenzo Conte and Alessandra Conte	Staten Island (NY)	USA	Legal Fees-Claims Management-IPC40	\$ 60,000.00
31	December 6, 2011	Clarity	Stratus Global Investments	Pablo Alejandro Fernandes Martins	Aveiro	Portugal	Legal Fees-Claims Management-IPC41	\$ 50,000.00
32	December 6, 2011	Clarity	Stratus Global Investments	Senzani International C.A.	Willestamstad	Curacao	Legal Fees-Claims Management-IPC42	\$ 200,000.00
33	December 6, 2011	Clarity	Stratus Global Investments	Global Morgan Group (HK) Limited	Hong Kong	China	Legal Fees-Claims Management-IPC43	\$ 170,000.00
34	December 6, 2011	Clarity	Stratus Global Investments	Jeancenter Corporation S.A	Colon	Panama	Legal Fees-Claims Management-IPC44	\$ 250,000.00
35	December 6, 2011	Clarity	Stratus Global Investments	Jumbo Zona Libre, S.A	Colon	Panama	Legal Fees-Claims Management-IPC45	\$ 115,839.00
36	December 6, 2011	Clarity	Stratus Global Investments	AA Group Limited	Guangzhou	China	Legal Fees-Claims Management-IPC46	\$ 325,000.00
37	December 6, 2011	Clarity	Stratus Global Investments	1. Totalbank Curacao N.V. 2. Inversiones Keromuchi CA	Willestamstad	Curacao	Legal Fees-Claims Management-IPC47	\$ 100,000.00
38	December 6, 2011	Clarity	Stratus Global Investments	Senzani International C.A.	Willestamstad	Curacao	Legal Fees-Claims Management-IPC48	\$ 100,000.00
39	December 7, 2011	Clarity	Stratus Global Investments	Flores-Hidalgo Sociedades e Inversiones, S.L.	Barcelona	Spain	Exchange of Funds	\$ 438,650.00

40	December 7, 2011	Clarity	Stratus Global Investments	GFH Short Interest Private Fund, Inc	Panama City	Panama	Exchange of Funds for Client 0045-7	\$ 240,550.50
41	December 7, 2011	Clarity	Stratus Global Investments	GFH Short Interest Private Fund, Inc	Panama City	Panama	Exchange of Funds for Client 0045-7	\$ 242,100.00
42	December 8, 2011	Clarity	Stratus Global Investments	1. Banesco S.A 2. Inversiones A.M. Canaima C.A	Panama City	Panama	Legal Fees-Claims Management IPC49	\$ 25,000.00
43	December 9, 2011	Clarity	Stratus Global Investments	Lennox Parts LLC	Doral (FL)	USA	Spare parts for vehicles / Venezuela Project	\$ 450,000.00
44	December 9, 2011	Clarity	Stratus Global Investments	Tecnoser SRL	Modena	Italy	Tale Provider / Venezuela Project	\$ 200,000.00
45	December 9, 2011	Clarity	Stratus Global Investments	May's Zona Libre, S.A	Colon	Panama	Legal Fees- Claims Management-IPC49	\$ 350,000.00
46	December 12, 2011	Clarity	Stratus Global Investments	Global Morgan Group (HK) Lim.	Hong Kong	China	Legal Fees- Claims Management-IPC50	\$ 180,000.00
47	December 12, 2011	Clarity	Stratus Global Investments	Ricardo Antonio FernandesSarrico	Aveiro	Portugal	Legal Fees-Claims Management-IPC51	\$ 150,000.00
48	December 12, 2011	Clarity	Stratus Global Investments	Marsicano Tafuri Emilio	Guatire	Venezuela	Legal Fees-Claims Management-IPC52	\$ 100,000.00
49	December 12, 2011	Clarity	Stratus Global Investments	1. Banesco S.A. 2. Inversiones A.M. Canaima C.A	Panama City	Panama	Legal Fees-Claims Management-IPC53	\$ 117,365.00
TOTAL:								\$ 8,171,817.00

EXHIBIT 28-9

BY PURPOSE		
Purpose	Count	Sum of Amount
Establishment Fee	1	\$ 4,800.00
Exchange of funds	6	\$ 1,840,256.00
Legal fees - Claims Management	36	\$ 4,778,211.00
Venezuela Project	6	\$ 1,548,550.00
TOTAL:	49	\$ 8,171,817.00

BY COUNTRY		
Country	Count	Sum of Amount
China	7	\$ 934,800.00
Curacao	5	\$ 600,000.00
Italy	2	\$ 255,000.00
Panama	16	\$ 2,764,716.50
Portugal	3	\$ 345,000.00
Spain	2	\$ 877,800.50
USA	8	\$ 1,470,000.00
Venezuela	6	\$ 924,500.00
TOTAL:	49	\$ 8,171,817.00

BY BENEFICIARY		
Beneficiary	Count	Sum of Amount
GFH Short Interest Private Fund, Inc	4	\$ 962,455.50
1. Banesco S.A 2. Inversiones A.M. Canaima C.A	3	\$ 257,872.00
Global Morgan Group (HK) Lim.	3	\$ 465,000.00
Jumbo Zona Libre, S.A	3	\$ 315,839.00
Senzani International C.A.	3	\$ 400,000.00
1. Totalbank Curacao N.V. 2. Inversiones Keromuchi CA	2	\$ 200,000.00
Flores-Hidalgo Sociedades e Inversiones, S.L.	2	\$ 877,800.50
Lennox Parts LLC	2	\$ 750,000.00
Pablo Alejandro Fernandes Martins	2	\$ 200,000.00
Ricardo Antonio Fernandes Sarrico	2	\$ 295,000.00
AA Group Limited	1	\$ 325,000.00
Agustin Gonzalez	1	\$ 70,000.00
America Economia 2021, C.A	1	\$ 200,000.00
Apolo Zona Libre	1	\$ 150,000.00
Corporacion Corriager C.A. LLC	1	\$ 220,000.00
Fernando Padron	1	\$ 28,500.00
Franca Cravino	1	\$ 55,000.00
Games Plus Electronic C.A.	1	\$ 100,000.00
Healy Consultants (Hong Kong) Limited	1	\$ 4,800.00
Irene Vianello	1	\$ 126,000.00
Jeancenter Corporation S.A	1	\$ 250,000.00
Kam Pong Cheung	1	\$ 100,000.00
Marsicano Tafuri Emilio	1	\$ 100,000.00
Maruja Ayala de Morales	1	\$ 100,000.00
May's Zona Libre, S.A	1	\$ 350,000.00
Pablo Fernandes	1	\$ 90,000.00
Profit Finacial INC	1	\$ 178,550.00
Samuel Carciente Sananes	1	\$ 100,000.00
Tania Dos Santos	1	\$ 100,000.00
Tecnoser SRL	1	\$ 200,000.00
Venezolana de Control Intermodal, C.A.	1	\$ 500,000.00
Vincenzo Conte and Alessandra Conte	1	\$ 60,000.00
Virginland Technology Co. Limited	1	\$ 40,000.00
TOTAL:	49	\$ 8,171,817.00

EXHIBIT 28-10

Payment to Management 1

Date	From	Amount	Description
10.04.2011	Stratus Int.	USD305.885,-	Annual salary
22.08.2011	SG	USD36.611,-	Tuition fee
30.09.2011	SG	USD172.000,-	Compensation/Salary+Bonus
21.11.2011	SG	USD35.901,-	Salaries Sept/Oct11
09.01.2012	SG	USD24.000,-	Salaries Nov/Dec11
18.04.2012	SG	USD36.000,-	Salaries Jan/Feb/Mar12
13.06.2012	SG	USD24.000,-	Salaries Apr/May12
25.09.2012	SG	USD36.000,-	Salaries Jun/Jul/Aug12
25.12.2012	Ali Sadr	CAD65.779,38	Final Clearance for Venz project

Payment to Bahram Karimi

21.05.2013	SG	TRY15.000,-	Salaries Mar/Apr13 Akbank
13.08.2013	Straturk	USD11.685,28	Salaries May/Jun/Jul13 Akbank
27.11.2013	Straturk	USD25.000,-	Advance payment
31.01.2014	Straturk	TRY50.000	Remaining payment for clearance the salary and partial bonuses till end of Dec13
14.05.2014	Straturk	USD32.000	Salaries Jan/Feb/Mar/Apr14
14.08.2014	Straturk	TRY34.382,40	Salaries May/Jun14 USD16K
21.10.2014	Straturk	TRY71.974,40	Salaries Jul/Aug/Sept/Oct USD32K

Payment to Ekrem Cinar

Date	From	Amount	Description
05.03.2013	SG	TRY75.717,60	Salaries Dec12, Jan, Feb13 USD42K
21.05.2013	SG	USD28.000	Salaries Mar, Apr13
05.06.2013	Straturk	USD10.000	Monthly advance
08.07.2013	Ali Sadr-S	USD10.000	Salary Jun13
15.08.2013	Straturk	USD10.000	Salary Jul13
19.09.2013	Ali Sadr-S	USD10.000	Salary Aug13
18.10.2013	Ali Sadr-S	USD10.000	Salary Sept13
13.12.2013	Straturk	USD30.000	Salaries Oct-Nov-Dec13
07.03.2014	Straturk	USD20.000	Salaries Jan-Feb14
05.05.2014	Straturk	USD20.000	Salaries Mar-Apr14
09.05.2014	Straturk	USD45.000	Salary Compensation and performance bonus
15.07.2014	Straturk	TRY21.000	Last payment USD10K

Payment to Mustafa Cetinel

Date	From	Amount	Description
05.06.2013	Straturk	USD10.000	Monthly advance
05.06.2013	Straturk	USD29.500	Close of Venezuela
08.07.2013	Ali Sadr-S	USD10.000	Salary Jun13
15.08.2013	Straturk	USD10.000	Salary Jul13
19.09.2013	Ali Sadr-S	USD10.000	Salary Aug13
18.10.2013	Ali Sadr-S	USD10.000	Salary Sept13
13.12.2013	Straturk	USD30.000	Salaries Oct-Nov-Dec13
07.03.2014	Straturk	USD20.000	Salaries Jan-Feb14
05.05.2014	Straturk	USD20.000	Salaries Mar-Apr14
14.07.2014	Brittstone	USD20.000	Salaries May-Jun14
29.08.2014	Ali Sadr-S	USD20.000	Salaries Jul-Aug14
28.11.2014	Ali Sadr-S	USD30.000	Salaries Sept-Oct-Nov14

Payment to Mohammad Hajigolam

Date	From	Amount	Description
09.10.2013	Straturk	USD12.000	Salaries Jul, Aug, Sept13
11.12.2013	Straturk	USD8.000	Salaries Oct, Nov13
07.03.2014	Straturk	USD8.000	Salaries Dec13, Jan14
09.05.2014	Straturk	USD8.000	Salaries Feb, Mar14
11.08.2014	Brittstone	USD12.747,82	Salaries Apr, May, Jun14
08.09.2014	Brittstone	USD8.000	Salaries Jul, Aug14

Payment to Tekyen - Semih Arslan

Date	From	Amount	Description
05.03.2013	SG	TRY122.050,05	IPC9-10 For the total of USD66.700,27
08.08.2013	SG	USD35.353,46	IPC11
24.09.2013	SG	USD32.000	IPC12-1st installment
30.09.2013	SG	USD31.550,64	IPC12-2nd installment
12.12.2013	Straturk	USD56.254	IPC13
09.05.2014	Straturk	USD50.000	Final IPC-1st installment
13.08.2014	Straturk	TRY125.349,60	Final IPC-2nd and last installment USD58K

**GOVERNMENT
EXHIBIT
2304A
18 Cr. 224 (AJN)**

EXHIBIT 28-11

3/6/20

Robert part (cont.)

↳ Lynd

- Ex. 432 discussed and
contents

E. Fator
(cont.)

- Trial prep.

EXHIBIT 28-12

Blaar

Latx, pencil 3/6

Clarified answer to whether \$ was JP Morgan's

EXHIBIT 28-13

From: Nevins, Talya <NevinsT@dany.nyc.gov>
Sent: Wednesday, March 4, 2020 11:49 AM
To: Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>
Cc: Nelson, Matthew <NelsonM@dany.nyc.gov>
Subject: RE: TRAVEL TO IRAN - Draft Chart

Hi Garrett,

I hope this morning is going well. As far as I'm concerned, the Iran travel summary chart (attached) is complete.

I did have to make a few judgment calls while verifying the chart against the underlying email exhibits. Specifically, some of the e-tickets have different dates for the purchase, the flight, and the ticket's NVA/NVB dates. Jane's chart was not always consistent about which date it listed for the trip. I chose to always use the Flight Date, except in one instance where there was an NVA date that came earlier than the "flight date" and the "flight date" in question was duplicative with a different e-ticket. I can explain this over the phone if need be.

Pending your final review and approval, this chart is ready to go for whenever you need it.

Talya

From: Nevins, Talya
Sent: Tuesday, March 3, 2020 1:29 PM
To: Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>
Cc: Nelson, Matthew <NelsonM@dany.nyc.gov>
Subject: TRAVEL TO IRAN - Draft Chart

Garrett,

Please find attached my draft of the Iran Travel Summary chart. It incorporates the passport analysis as well as the travel itinerary chart that Jane made based on the emails. It includes all dates that we know Sadr departed from or arrived in Tehran. Please let me know if you'd like it edited or formatted any differently.

Two questions:

1. As previously asked, should I go back to the original emails in order to verify the info included in Jane's chart?
2. I included a count for "total trips to/from Iran" (43). Jane's chart had an additional count for "round trips to and from Iran." I am not sure how she counted these "round trips." As of now I only included flights that were directly to or from Iran in my chart. I have a guess that her 'round trip' count included flights between locations that do not include Tehran (e.g. Tehran to London, London to Frankfurt, Frankfurt to Tehran). This flight pattern would not register as a round trip on the chart as I have it now, which would exclude that hypothetical 'London to Frankfurt' flight. I think it would be hard to verify that as a round trip unless the emails obviously show a connecting flight (e.g. Tehran-London, then London-Tehran with a layover in Frankfurt). Those types of connecting flights would not, however, register on the passport analysis. For the sake of consistency, I decided to only include flights that directly included Iran as a point of departure or arrival, recognizing that this could make it harder to count "round trips." When you look at the chart, please let me know if you think I should change this up.

Thank you,

Talya R Nevins

Paralegal, Major Economic Crimes Bureau
Office of the New York County District Attorney
80 Centre Street, 8th Floor
New York, NY 10013
Phone: 212-335-4353

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EXHIBIT 28-14

From: "Krouse, Michael (USANYS)" <MKrouse@usa.doj.gov>
Date: March 5, 2020 at 7:41:50 PM EST
To: "Nevins, Talya" <NevinsT@dany.nyc.gov>, "Lynch, Garrett (USANYS) [Contractor]" <GLynch@usa.doj.gov>, "Nelson, Matthew" <NelsonM@dany.nyc.gov>
Cc: "Lake, Stephanie (USANYS)" <SLake@usa.doj.gov>, "Kim, Jane (USANYS) 4" <JKim4@usa.doj.gov>, "Lynch, Garrett" <LynchG@dany.nyc.gov>
Subject: RE: Exhibit for summary chart and existing spreadsheet

Thanks Talya. For the charts by purpose, country, and beneficiary—can you bold the totals and shade them a different color so they stand out? Once you do that, I think we're good to go.

For the all payments chart, can you remove the shortened purpose column (that was just to put the pivot table together), and put the headings on the second page as well. Any way we can make the text bigger and more readable (by compressing the columns or other ways)?

Can you send them all back in PDF, and we'll then get them marked?

Thanks.

From: Nevins, Talya <NevinsT@dany.nyc.gov>
Sent: Tuesday, March 3, 2020 9:47 AM
To: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Nelson, Matthew <NelsonM@dany.nyc.gov>
Cc: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett <LynchG@dany.nyc.gov>
Subject: RE: Exhibit for summary chart and existing spreadsheet

Here you go. The Excel contains two tabs: 1. All Payments and 2. Breakdowns, which includes charts by purpose, country, and beneficiary. I also exported each of the four tables as its own PDF. All attached.

Let me know if you want anything changed or formatted differently.

Good luck this morning with opening!

From: Krouse, Michael (USANYS) [<mailto:Michael.Krouse@usdoj.gov>]
Sent: Monday, March 2, 2020 9:25 PM

To: Nevins, Talya <NevinsT@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Nelson, Matthew <NelsonM@dany.nyc.gov>
Cc: Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lynch, Garrett <LynchG@dany.nyc.gov>
Subject: RE: Exhibit for summary chart and existing spreadsheet

Yes, please send. Thanks!

From: Nevins, Talya <NevinsT@dany.nyc.gov>
Sent: Monday, March 2, 2020 12:22 PM
To: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Nelson, Matthew <NelsonM@dany.nyc.gov>
Cc: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett <LynchG@dany.nyc.gov>
Subject: RE: Exhibit for summary chart and existing spreadsheet

Hi Michael,

The charts are done. Can I email them to you? I have them all in both excel and PDF formats.

I ended up doing two rows labeled 1 and 2 for the five payments that had two beneficiaries, as I thought the extra column made the chart too bulky, but can easily change it back if you prefer.

From: Krouse, Michael (USANYS) [<mailto:Michael.Krouse@usdoj.gov>]
Sent: Friday, February 28, 2020 6:17 PM
To: Nevins, Talya <NevinsT@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Nelson, Matthew <NelsonM@dany.nyc.gov>
Cc: Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lynch, Garrett <LynchG@dany.nyc.gov>
Subject: RE: Exhibit for summary chart and existing spreadsheet

Thanks, Talya. Yep, add the missing USD payment. Let's do columns for beneficiary 1, beneficiary 2 (which we'll leave blank if there was no second beneficiary). We can see how that looks.

From: Nevins, Talya <NevinsT@dany.nyc.gov>
Sent: Friday, February 28, 2020 2:28 PM
To: Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Nelson, Matthew <NelsonM@dany.nyc.gov>
Cc: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett <LynchG@dany.nyc.gov>
Subject: RE: Exhibit for summary chart and existing spreadsheet

A few more questions about this chart, for whenever someone has a minute.

1. There is one more USD payment that is in the PDF, but not the original chart. The payment is identical in format to other USD payments that were included, and is the last USD payment in the PDF, leading me to believe that it was just left off. I added it to my chart, but if there's some reason it shouldn't be included, please let me know. The payment is found on p. 51 of the PDF.
2. There are 5 payments that list different names as "beneficiario" and "beneficiario final" (most only list "beneficiario"). The original chart only lists the name that is given for "beneficiario," and

leaves off the “beneficiario final.” Should I stick with this format? I can be more specific if necessary. Those payments are found on pp. 22, 25, 39, 44, and 51 of the PDF.

Talya

From: Lynch, Garrett (USANYS) [Contractor] [<mailto:Garrett.Lynch@usdoj.gov>]
Sent: Friday, February 28, 2020 1:35 PM
To: Nevins, Talya <NevinsT@dany.nyc.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; Nelson, Matthew <NelsonM@dany.nyc.gov>
Cc: Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lynch, Garrett <LynchG@dany.nyc.gov>
Subject: RE: Exhibit for summary chart and existing spreadsheet

Just the USD payments. Thanks!

From: Nevins, Talya <NevinsT@dany.nyc.gov>
Sent: Friday, February 28, 2020 1:33 PM
To: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Nelson, Matthew <NelsonM@dany.nyc.gov>
Cc: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>
Subject: RE: Exhibit for summary chart and existing spreadsheet

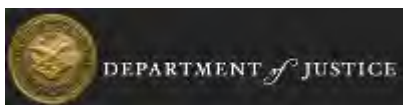
Michael,

I am going through the 52-page PDF and verifying the charts you sent over before I make a new one. I noticed that in the 52-page PDF there are records relating to 48 USD payments (Clarity-Stratus-Beneficiary) as well as 1 EUR payment (Stratus-Beneficiary) and 1 CAD payment (Stratus-Beneficiary). Only the 48 USD payments are included in the charts you sent. Do you want me to incorporate the EUR / CAD payments into the chart that I make for trial, or otherwise address them?

Thanks,

Talya

From: Krouse, Michael (USANYS) [<mailto:Michael.Krouse@usdoj.gov>]
Sent: Thursday, February 27, 2020 7:56 PM
To: Nevins, Talya <NevinsT@dany.nyc.gov>; Nelson, Matthew <NelsonM@dany.nyc.gov>
Cc: Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lynch, Garrett <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>
Subject: FW: Exhibit for summary chart and existing spreadsheet



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EXHIBIT 29

Kim, Jane (USANYS) 4

From: Lake, Stephanie (USANYS)
Sent: Saturday, March 7, 2020 4:24 PM
To: Weingarten, Reid; Heberlig, Brian; Silverman, Nicholas
Cc: Krouse, Michael (USANYS); Kim, Jane (USANYS) 4; Lynch, Garrett (USANYS) [Contractor]; Milione, Shawn (USANYS) [Contractor]
Subject: RE: U.S. v. Sadr

Counsel,

We attempted to send you a number of attachments, which will not go through without encryption. It looks like Steptoe's servers are blocking the encrypted email. Shawn will upload the files to the link he has been using. The descriptions are below.

Stephanie

From: Lake, Stephanie (USANYS)
Sent: Saturday, March 07, 2020 4:04 PM
To: Weingarten, Reid <RWeingarten@steptoe.com>; Heberlig, Brian <BHeberlig@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>
Cc: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Milione, Shawn (USANYS) [Contractor] <SMilione@usa.doj.gov>
Subject: U.S. v. Sadr

Counsel,

Mr. Dubowitz is still very ill. As a result, we do not intend to call him as a witness in our case-in-chief. It's possible that, depending on the defense case, we will call him as a rebuttal witness.

In addition, we've attached the following documents:

- Updated GX 2284D – there were formatting problems with our version. We think the attached corrects them.
- 3508-08 – 3500 from today
- GX 411 – we intend to offer this on Monday. Let us know if you will stipulate to authenticity.
- GX 456 – we intend to offer this on Monday. Let us know if you will stipulate to authenticity.
- GX 495A & B – we intend to offer these on Monday (likely in redacted form), although think a stipulation that the defendant had bank accounts at HSBC from January 2010 through October 2013 might be simpler. Let us know how you prefer to proceed.
- GX 704 – this is the modified version of the travel chart. Please confirm whether you have any remaining concerns.
- GX 705A & B – these are summary charts reflecting the information in GX 2090A. Please confirm whether you have any objections.
- Updated GX 2304A – we enlarged some of the cells, as the formatting of the PDFd excel file was cutting off some of the data. The content is the same.
- 3504-10 – Peri 3500, which was provided in hard copy yesterday morning.
- 3505-06 – Blair 3500, which was provided in hard copy yesterday morning.
- 3513-02 – Paralegal 3500 for summary chart (you may already have this)
- 3513-03 – Paralegal 3500 for summary chart (you may already have this)

We are still working on one additional summary chart, which we expect to provide later today.

Stephanie Lake
Assistant United States Attorney
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007
Tel: (212) 637-1066

EXHIBIT 30

Kim, Jane (USANYS) 4

From: Silverman, Nicholas <nsilverman@steptoe.com>
Sent: Saturday, March 7, 2020 4:34 PM
To: Milione, Shawn (USANYS) [Contractor]; Lake, Stephanie (USANYS); Kim, Jane (USANYS) 4; Krouse, Michael (USANYS); 'Garrett Lynch'
Subject: RE: Alternative Upload Link

We received a total of 14 files. Can you please confirm that is the correct number?

Nicholas P. Silverman
Associate
nsilverman@steptoe.com

Step toe

+1 202 429 8096 direct Steptoe & Johnson LLP
+1 617 595 6559 mobile 1330 Connecticut Avenue, NW
+1 202 429 3902 fax Washington, DC 20036
 www.steptoe.com

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From: Silverman, Nicholas
Sent: Saturday, March 7, 2020 4:27 PM
To: Milione, Shawn (USANYS) [Contractor] <Shawn.Milione@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; jane.kim@usdoj.gov; michael.krouse@usdoj.gov; Garrett Lynch <LynchG@dany.nyc.gov>
Subject: Alternative Upload Link

[Click here](#) to upload files.

In case the other link continues giving you trouble.

Nicholas P. Silverman
Associate
nsilverman@steptoe.com

Step toe

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EXHIBIT 31

Kim, Jane (USANYS) 4

From: Lake, Stephanie (USANYS)
Sent: Saturday, March 7, 2020 4:36 PM
To: Silverman, Nicholas; Milione, Shawn (USANYS) [Contractor]; Kim, Jane (USANYS) 4; Krouse, Michael (USANYS); 'Garrett Lynch'
Subject: RE: Alternative Upload Link

That's correct.

From: Silverman, Nicholas <nsilverman@steptoe.com>
Sent: Saturday, March 07, 2020 4:34 PM
To: Milione, Shawn (USANYS) [Contractor] <SMilione@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; 'Garrett Lynch' <LynchG@dany.nyc.gov>
Subject: RE: Alternative Upload Link

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Nicholas P. Silverman
Associate
nsilverman@steptoe.com

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From: Silverman, Nicholas
Sent: Saturday, March 7, 2020 4:27 PM
To: Milione, Shawn (USANYS) [Contractor] <Shawn.Milione@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; jane.kim@usdoj.gov; michael.krouse@usdoj.gov; Garrett Lynch <LynchG@dany.nyc.gov>
Subject: Alternative Upload Link

[Click here](#) to upload files.

In case the other link continues giving you trouble.

Nicholas P. Silverman
Associate
nsilverman@steptoe.com

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EXHIBIT 32

Kim, Jane (USANYS) 4

From: Heberlig, Brian <BHeberlig@steptoe.com>
Sent: Saturday, March 7, 2020 4:57 PM
To: Lake, Stephanie (USANYS); Weingarten, Reid; Silverman, Nicholas
Cc: Krouse, Michael (USANYS); Kim, Jane (USANYS) 4; Lynch, Garrett (USANYS) [Contractor]; Milione, Shawn (USANYS) [Contractor]
Subject: RE: U.S. v. Sadr

We request immediate disclosure of (1) where GX411 came from, (2) how long it has been in the government's possession, (3) why we are only receiving it today. This is the second episode—along with GX430, GX431, and GX432—of the government producing fundamentally exculpatory documents mid-trial. In this instance, the document was produced after the government's OFAC witness, who would have been subject to cross-examination on this document. Provide this information by 6 pm or we will see the intervention of the Court.

From: Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>
Sent: Saturday, March 7, 2020 4:24 PM
To: Weingarten, Reid <RWeingarten@steptoe.com>; Heberlig, Brian <BHeberlig@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>
Cc: Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Milione, Shawn (USANYS) [Contractor] <Shawn.Milione@usdoj.gov>
Subject: RE: U.S. v. Sadr

Counsel,

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Stephanie

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Sent: Saturday, March 07, 2020 4:04 PM
To: Weingarten, Reid <RWeingarten@steptoe.com>; Heberlig, Brian <BHeberlig@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>
Cc: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Milione, Shawn (USANYS) [Contractor] <SMilione@usa.doj.gov>
Subject: U.S. v. Sadr

Counsel,

Mr. Dubowitz is still very ill. As a result, we do not intend to call him as a witness in our case-in-chief. It's possible that, depending on the defense case, we will call him as a rebuttal witness.

In addition, we've attached the following documents:

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- GX 456 – we intend to offer this on Monday. Let us know if you will stipulate to authenticity.
- GX 495A & B – we intend to offer these on Monday (likely in redacted form), although think a stipulation that the defendant had bank accounts at HSBC from January 2010 through October 2013 might be simpler. Let us know how you prefer to proceed.
- GX 704 – this is the modified version of the travel chart. Please confirm whether you have any remaining concerns.
- GX 705A & B – these are summary charts reflecting the information in GX 2090A. Please confirm whether you have any objections.
- Updated GX 2304A – we enlarged some of the cells, as the formatting of the PDFd excel file was cutting off some of the data. The content is the same.
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- 3505-06 – Blair 3500, which was provided in hard copy yesterday morning.
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We are still working on one additional summary chart, which we expect to provide later today.

Stephanie Lake
Assistant United States Attorney
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007
Tel: (212) 637-1066

EXHIBIT 33

Kim, Jane (USANYS) 4

From: Kim, Jane (USANYS) 4
Sent: Saturday, March 7, 2020 5:22 PM
To: Weingarten, Reid

Really, Reid??

Jane Kim
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
Phone: (212) 637-2038
Email: jane.kim@usdoj.gov

EXHIBIT 34

Kim, Jane (USANYS) 4

From: Lake, Stephanie (USANYS)
Sent: Saturday, March 7, 2020 5:23 PM
To: Krouse, Michael (USANYS); Kim, Jane (USANYS) 4; Lynch, Garrett (USANYS) [Contractor]
Subject: Proposed response

Brian,

We do not agree with your characterization of GX 430, 431, 432, or 411 as *Brady*. These are all exhibits the Government has introduced or is seeking to introduce in our case. Perhaps you can explain how it is you think GX 411 is helpful to your case.

In any event, we have been aware of the letter since mid-January. We thought it was part of the Commerzbank subpoena return that was produced in discovery. We now understand that it came from an unrelated DANY investigation, and therefore was not in the Commerzbank subpoena return.

It is not clear to us how this document would have been relevant to the OFAC witness's testimony.

Stephanie Lake
Assistant United States Attorney
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007
Tel: (212) 637-1066

EXHIBIT 35

Kim, Jane (USANYS) 4

From: Weingarten, Reid <RWeingarten@steptoe.com>
Sent: Saturday, March 7, 2020 5:34 PM
To: Kim, Jane (USANYS) 4
Subject: Re:

Catching up...(I have a hideous birthday this weekend and my family is gathering from around the world)...I assume your q is about our reaction to the commerzbank exhibit that just came in...does seem passing strange we never saw it before...(or did we?)...let's clear that up and then we will figure out where we go with it

Sent from my BlackBerry 10 smartphone.

From: Kim, Jane (USANYS) 4
Sent: Saturday, March 7, 2020 5:21 PM
To: Weingarten, Reid
Subject:

Really, Reid??

Jane Kim
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
Phone: (212) 637-2038
Email: jane.kim@usdoj.gov

EXHIBIT 36

Kim, Jane (USANYS) 4

From: Kim, Jane (USANYS) 4
Sent: Saturday, March 7, 2020 5:36 PM
To: Heberlig, Brian; Lake, Stephanie (USANYS); Weingarten, Reid; Silverman, Nicholas
Cc: Krouse, Michael (USANYS); Lynch, Garrett (USANYS) [Contractor]; Milione, Shawn (USANYS) [Contractor]
Subject: RE: U.S. v. Sadr

Brian,

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Jane

From: Heberlig, Brian <BHeberlig@steptoe.com>
Sent: Saturday, March 7, 2020 4:57 PM
To: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>
Cc: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Milione, Shawn (USANYS) [Contractor] <SMilione@usa.doj.gov>
Subject: RE: U.S. v. Sadr

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From: Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>
Sent: Saturday, March 7, 2020 4:24 PM
To: Weingarten, Reid <RWeingarten@steptoe.com>; Heberlig, Brian <BHeberlig@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>
Cc: Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Milione, Shawn (USANYS) [Contractor] <Shawn.Milione@usdoj.gov>
Subject: RE: U.S. v. Sadr

Counsel,

We attempted to send you a number of attachments, which will not go through without encryption. It looks like Steptoe's servers are blocking the encrypted email. Shawn will upload the files to the link he has been using. The descriptions are below.

Stephanie

From: Lake, Stephanie (USANYS)
Sent: Saturday, March 07, 2020 4:04 PM
To: Weingarten, Reid <RWeingarten@steptoe.com>; Heberlig, Brian <BHeberlig@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>
Cc: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Milione, Shawn (USANYS) [Contractor] <SMilione@usa.doj.gov>
Subject: U.S. v. Sadr

Counsel,

Mr. Dubowitz is still very ill. As a result, we do not intend to call him as a witness in our case-in-chief. It's possible that, depending on the defense case, we will call him as a rebuttal witness.

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- 3508-08 – 3500 from today
- GX 411 – we intend to offer this on Monday. Let us know if you will stipulate to authenticity.
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- 3504-10 – Peri 3500, which was provided in hard copy yesterday morning.
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- 3513-02 – Paralegal 3500 for summary chart (you may already have this)
- 3513-03 – Paralegal 3500 for summary chart (you may already have this)

We are still working on one additional summary chart, which we expect to provide later today.

Stephanie Lake
Assistant United States Attorney
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007
Tel: (212) 637-1066

EXHIBIT 37

Kim, Jane (USANYS) 4

From: Weingarten, Reid <RWeingarten@steptoe.com>
Sent: Saturday, March 7, 2020 5:46 PM
To: Kim, Jane (USANYS) 4
Subject: Re:

So...thank you...I am about to greet everyone and start drinking a lot of bourbon...all kidding aside, troubled that we never saw this...nothing is going to happen tonite...let's see what the morrow brings....reid

Sent from my BlackBerry 10 smartphone.

From: Kim, Jane (USANYS) 4
Sent: Saturday, March 7, 2020 5:37 PM
To: Weingarten, Reid
Subject: RE: Re:

Your birthday?! Happy Birthday! Yeah, just responded.

From: Weingarten, Reid <RWeingarten@steptoe.com>
Sent: Saturday, March 7, 2020 5:34 PM
To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>
Subject: Re:

Catching up...(I have a hideous birthday this weekend and my family is gathering from around the world)...I assume your q is about our reaction to the commerzbank exhibit that just came in...does seem passing strange we never saw it before...(or did we?)...let's clear that up and then we will figure out where we go with it

Sent from my BlackBerry 10 smartphone.

From: Kim, Jane (USANYS) 4
Sent: Saturday, March 7, 2020 5:21 PM
To: Weingarten, Reid
Subject:

Really, Reid??

Jane Kim
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
Phone: (212) 637-2038
Email: jane.kim@usdoj.gov

EXHIBIT 38

Kim, Jane (USANYS) 4

From: Weingarten, Reid <RWeingarten@steptoe.com>
Sent: Saturday, March 7, 2020 6:15 PM
To: Kim, Jane (USANYS) 4
Subject: Re:

So one last q...you thought we had it?

Sent from my BlackBerry 10 smartphone.

From: Kim, Jane (USANYS) 4
Sent: Saturday, March 7, 2020 5:37 PM
To: Weingarten, Reid
Subject: RE: Re:

Your birthday?! Happy Birthday! Yeah, just responded.

From: Weingarten, Reid <RWeingarten@steptoe.com>
Sent: Saturday, March 7, 2020 5:34 PM
To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>
Subject: Re:

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From: Kim, Jane (USANYS) 4
Sent: Saturday, March 7, 2020 5:21 PM
To: Weingarten, Reid
Subject:

Really, Reid??

Jane Kim
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
Phone: (212) 637-2038
Email: jane.kim@usdoj.gov

EXHIBIT 39

Kim, Jane (USANYS) 4

From: Kim, Jane (USANYS) 4
Sent: Saturday, March 7, 2020 7:40 PM
To: 'Weingarten, Reid'
Subject: RE: Re:

Yes – we thought it was produced in discovery as part of the Commerzbank subpoena return.

From: Weingarten, Reid <RWeingarten@steptoe.com>
Sent: Saturday, March 7, 2020 6:15 PM
To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>
Subject: Re:

So one last q...you thought we had it?

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To: Weingarten, Reid
Subject: RE: Re:

Your birthday?! Happy Birthday! Yeah, just responded.

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Sent: Saturday, March 7, 2020 5:34 PM
To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>
Subject: Re:

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Sent from my BlackBerry 10 smartphone.

From: Kim, Jane (USANYS) 4
Sent: Saturday, March 7, 2020 5:21 PM
To: Weingarten, Reid
Subject:

Really, Reid??

Jane Kim
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
Phone: (212) 637-2038
Email: jane.kim@usdoj.gov

EXHIBIT 40

Kim, Jane (USANYS) 4

From: Heberlig, Brian <BHeberlig@steptoe.com>
Sent: Saturday, March 7, 2020 10:09 PM
To: Kim, Jane (USANYS) 4; Lake, Stephanie (USANYS); Weingarten, Reid; Silverman, Nicholas
Cc: Krouse, Michael (USANYS); Lynch, Garrett (USANYS) [Contractor]; Milione, Shawn (USANYS) [Contractor]
Subject: RE: U.S. v. Sadr

If you have been aware of the letter since mid-January, why wasn't it on the government's pretrial exhibit list instead of appearing the day before the government rests its case? The exculpatory nature of the exhibit is self-evident.

From: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>
Sent: Saturday, March 7, 2020 5:36 PM
To: Heberlig, Brian <BHeberlig@steptoe.com>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>
Cc: Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Milione, Shawn (USANYS) [Contractor] <Shawn.Milione@usdoj.gov>
Subject: RE: U.S. v. Sadr

Brian,

We do not agree with your characterization of GX 430, 431, 432, or 411 as *Brady*. These are all exhibits the Government has introduced or is seeking to introduce in our case. Perhaps you can explain how it is you think GX 411 is helpful to your case.

In any event, we have been aware of the letter since mid-January. We thought it was part of the Commerzbank subpoena return that was produced in discovery. We now understand that it came from an unrelated DANY investigation, and therefore was not in the Commerzbank subpoena return.

It is not clear to us how this document would have been relevant to the OFAC witness's testimony.

Jane

From: Heberlig, Brian <BHeberlig@steptoe.com>
Sent: Saturday, March 7, 2020 4:57 PM
To: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Weingarten, Reid <RWeingarten@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>
Cc: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Milione, Shawn (USANYS) [Contractor] <SMilione@usa.doj.gov>
Subject: RE: U.S. v. Sadr

We request immediate disclosure of (1) where GX411 came from, (2) how long it has been in the government's possession, (3) why we are only receiving it today. This is the second episode—along with GX430, GX431, and GX432—of the government producing fundamentally

exculpatory documents mid-trial. In this instance, the document was produced after the government's OFAC witness, who would have been subject to cross-examination on this document. Provide this information by 6 pm or we will see the intervention of the Court.

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Sent: Saturday, March 7, 2020 4:24 PM

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Cc: Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Milione, Shawn (USANYS) [Contractor] <Shawn.Milione@usdoj.gov>

Subject: RE: U.S. v. Sadr

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From: Lake, Stephanie (USANYS)

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Cc: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Milione, Shawn (USANYS) [Contractor] <SMilione@usa.doj.gov>

Subject: U.S. v. Sadr

Counsel,

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In addition, we've attached the following documents:

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- 3504-10 – Peri 3500, which was provided in hard copy yesterday morning.
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We are still working on one additional summary chart, which we expect to provide later today.

Stephanie Lake
Assistant United States Attorney
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007
Tel: (212) 637-1066

EXHIBIT 41

Kim, Jane (USANYS) 4

From: Kim, Jane (USANYS) 4
Sent: Sunday, March 8, 2020 7:30 AM
To: Lake, Stephanie (USANYS); Krouse, Michael (USANYS); LynchG@dany.nyc.gov; Lynch, Garrett (USANYS) [Contractor]
Subject: Proposed email to Brian

Brian,

As I explained in my last email, when we first saw the document in mid-January, we thought it had been part of Commerzbank's subpoena return and had been produced. Then, as we were marking exhibits and re-pulling all of the email exhibits up until 6 days before trial—because you objected to us pulling clean and authentic versions of all of the email evidence earlier—we didn't mark this document because it wasn't in our subpoena returns folder. Because of your cross of Peri on Friday, we looked for the document and realized late Friday night that it had not been marked or a part of the bank's subpoena return. Again, we don't see this document as exculpatory, as we would like to offer it tomorrow.

EXHIBIT 42

Kim, Jane (USANYS) 4

From: Lake, Stephanie (USANYS)
Sent: Sunday, March 8, 2020 7:55 AM
To: Kim, Jane (USANYS) 4
Cc: Krouse, Michael (USANYS); LynchG@dany.nyc.gov; Lynch, Garrett (USANYS)
[Contractor]
Subject: Re: Proposed email to Brian

Thank you for doing this. I think it's fair to say that we didn't think it was necessary to use when we saw it in January given our other evidence, assumed it was part of the Commerz subpoena return, and then never discussed it again. But we stumbled upon it this weekend and decided it would be useful given some of the arguments he made on Friday.

> On Mar 8, 2020, at 7:30 AM, Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov> wrote:

>

> Brian,

>

> As I explained in my last email, when we first saw the document in mid-January, we thought it had been part of Commerzbank's subpoena return and had been produced. Then, as we were marking exhibits and re-pulling all of the email exhibits up until 6 days before trial—because you objected to us pulling clean and authentic versions of all of the email evidence earlier—we didn't mark this document because it wasn't in our subpoena re. Because of your cross of Peri on Friday, we looked for the document and realized late Friday night that it had not been marked or a part of the bank's subpoena return. Again, we don't see this document as exculpatory, as we would like to offer it tomorrow.

EXHIBIT 43

Kim, Jane (USANYS) 4

From: Kim, Jane (USANYS) 4
Sent: Sunday, March 8, 2020 9:32 AM
To: Lake, Stephanie (USANYS); Lynch, Garrett (USANYS) [Contractor]; Krouse, Michael (USANYS)
Subject: FW: Proposed email to Brian

How's this?

#

Brian,

As I explained in my last email, when we first saw the document in mid-January, we thought it had been part of Commerzbank's subpoena return and had been produced. We didn't think it would be necessary to use given our other evidence about that payment. Given some of the arguments you made on Friday, we pulled the document and realized late Friday night that it hadn't been marked or part of the bank's subpoena return. Again, we don't see this document as exculpatory, as we would like to offer it tomorrow.

EXHIBIT 44

Kim, Jane (USANYS) 4

From: Lake, Stephanie (USANYS)
Sent: Sunday, March 8, 2020 9:37 AM
To: Kim, Jane (USANYS) 4; Lynch, Garrett (USANYS) [Contractor]; Krouse, Michael (USANYS)
Subject: RE: Proposed email to Brian

Few proposed tweaks below. Thank you for doing this. I'm a wimp.

-----Original Message-----

From: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>
Sent: Sunday, March 08, 2020 9:32 AM
To: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>
Subject: FW: Proposed email to Brian

How's this?

#

Brian,

As I explained in my last email, when we first saw the document in mid-January, we thought it had been part of Commerzbank's subpoena return and had been produced. We didn't think it would be necessary to use given our other evidence about that payment. Given some of the arguments you made on Friday, we decided that we did want to introduce it at trial.

Again, we don't see this document as exculpatory, as we would like to offer it tomorrow. Can you let us know your position on an authenticity stipulation for this document and the other bank records we sent yesterday, as well as whether you have any issues with the summary charts?

EXHIBIT 45

Kim, Jane (USANYS) 4

From: Kim, Jane (USANYS) 4
Sent: Sunday, March 8, 2020 9:38 AM
To: Lake, Stephanie (USANYS); Lynch, Garrett (USANYS) [Contractor]; Krouse, Michael (USANYS)
Subject: RE: Proposed email to Brian

Will send now. Thanks!

-----Original Message-----

From: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>
Sent: Sunday, March 8, 2020 9:37 AM
To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>
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EXHIBIT 46

Kim, Jane (USANYS) 4

From: Kim, Jane (USANYS) 4
Sent: Sunday, March 8, 2020 9:41 AM
To: 'Heberlig, Brian'; Lake, Stephanie (USANYS); Weingarten, Reid; Silverman, Nicholas
Cc: Krouse, Michael (USANYS); Lynch, Garrett (USANYS) [Contractor]; Milione, Shawn (USANYS) [Contractor]
Subject: RE: U.S. v. Sadr

Brian, Reid, and Nick:

As I explained in my last email, when we first saw the document in mid-January, we thought it had been part of Commerzbank's subpoena return and had been produced. We didn't think it would be necessary to use given our other evidence about that payment. Given some of the arguments you made on Friday, we decided that we did want to introduce it at trial.

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Thanks,
Jane

From: Heberlig, Brian <BHeberlig@steptoe.com>
Sent: Saturday, March 7, 2020 10:09 PM
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Cc: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Milione, Shawn (USANYS) [Contractor] <SMilione@usa.doj.gov>
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Sent: Saturday, March 7, 2020 4:57 PM

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Cc: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Milione, Shawn (USANYS) [Contractor] <SMilione@usa.doj.gov>

Subject: U.S. v. Sadr

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Stephanie Lake
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Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007
Tel: (212) 637-1066

EXHIBIT 47

Kim, Jane (USANYS) 4

From: Lake, Stephanie (USANYS)
Sent: Sunday, March 8, 2020 12:16 PM
To: Kim, Jane (USANYS) 4; Krouse, Michael (USANYS); Lynch, Garrett (USANYS) [Contractor]
Subject: FW: GX 411 - Response Requested by 2:00 p.m. or Earlier

Wtf.

From: Silverman, Nicholas <nsilverman@steptoe.com>
Sent: Sunday, March 08, 2020 12:15 PM
To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; 'Garrett Lynch' <LynchG@dany.nyc.gov>
Cc: Bishop, Bruce <BBishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>; Heberlig, Brian <BHeberlig@steptoe.com>; Weingarten, Reid <RWeingarten@steptoe.com>
Subject: GX 411 - Response Requested by 2:00 p.m. or Earlier

Counsel:

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EXHIBIT 48

Kim, Jane (USANYS) 4

From: Krouse, Michael (USANYS)
Sent: Sunday, March 8, 2020 12:24 PM
To: Lake, Stephanie (USANYS)
Cc: Kim, Jane (USANYS) 4; Lynch, Garrett (USANYS) [Contractor]
Subject: Re: GX 411 - Response Requested by 2:00 p.m. or Earlier

Yeah, we do not consent.

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EXHIBIT 49

Kim, Jane (USANYS) 4

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Sent: Sunday, March 8, 2020 12:49 PM
To: Lake, Stephanie (USANYS)
Cc: Kim, Jane (USANYS) 4; Lynch, Garrett (USANYS) [Contractor]
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EXHIBIT 50

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To: Krouse, Michael (USANYS)
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EXHIBIT 51

Kim, Jane (USANYS) 4

From: Kim, Jane (USANYS) 4
Sent: Sunday, March 8, 2020 1:11 PM
To: Lake, Stephanie (USANYS); Krouse, Michael (USANYS)
Cc: Lynch, Garrett (USANYS) [Contractor]
Subject: RE: GX 411 - Response Requested by 2:00 p.m. or Earlier

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EXHIBIT 54

Kim, Jane (USANYS) 4

From: Lynch, Garrett (USANYS) [Contractor]
Sent: Sunday, March 8, 2020 1:18 PM
To: Lake, Stephanie (USANYS); Kim, Jane (USANYS) 4
Cc: Krouse, Michael (USANYS)
Subject: RE: GX 411 - Response Requested by 2:00 p.m. or Earlier

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Cc: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>
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EXHIBIT 55

Kim, Jane (USANYS) 4

From: Lynch, Garrett (USANYS) [Contractor]
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To: Krouse, Michael (USANYS); Kim, Jane (USANYS) 4
Cc: Lake, Stephanie (USANYS)
Subject: RE: GX 411 - Response Requested by 2:00 p.m. or Earlier

There will be a blowup either way. I had a perfectly civil conversation with Heberlig about GX 432 on the phone the night before. Then he went bananas in court.

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Sent: Sunday, March 8, 2020 1:16 PM
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Cc: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>
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EXHIBIT 56

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From: Lake, Stephanie (USANYS)
Sent: Sunday, March 8, 2020 1:20 PM
To: Lynch, Garrett (USANYS) [Contractor]
Cc: Kim, Jane (USANYS) 4; Krouse, Michael (USANYS)
Subject: Re: GX 411 - Response Requested by 2:00 p.m. or Earlier

Emil thinks we should say we're not offering. Then if they actually want it in themselves / can articulate some real Brady theory, we'll have to deal with it. Apparently Crotty gave a similar instruction in Shulte....

On Mar 8, 2020, at 1:18 PM, Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov> wrote:

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To: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>
Cc: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>
Subject: Re: GX 411 - Response Requested by 2:00 p.m. or Earlier

That's fine, although I feel like it'll just be a scream fest.

On Mar 8, 2020, at 12:48 PM, Krouse, Michael (USANYS) <MKrouse@usa.doj.gov> wrote:

What do you think about proposing a phone call on this and the defense witnesses?

Sent from my iPhone

On Mar 8, 2020, at 12:23 PM, Krouse, Michael (USANYS)
<MKrouse@usa.doj.gov> wrote:

Yeah, we do not consent.

Sent from my iPhone

On Mar 8, 2020, at 12:16 PM, Lake, Stephanie (USANYS)
<SLake@usa.doj.gov> wrote:

Wtf.

From: Silverman, Nicholas
<nsilverman@steptoe.com>
Sent: Sunday, March 08, 2020 12:15 PM
To: Kim, Jane (USANYS) 4
<JKim4@usa.doj.gov>; Krouse, Michael
(USANYS) <MKrouse@usa.doj.gov>;
Lake, Stephanie (USANYS)
<SLake@usa.doj.gov>; 'Garrett Lynch'
<LynchG@dany.nyc.gov>
Cc: Bishop, Bruce
<BBishop@steptoe.com>; Fragale,
David <DFragale@steptoe.com>;
Heberlig, Brian
<BHeberlig@steptoe.com>;
Weingarten, Reid
<RWeingarten@steptoe.com>
Subject: GX 411 - Response Requested
by 2:00 p.m. or Earlier

Counsel:

We intend to request the following curative instruction from the Court. Please inform us by 2:00 p.m. (or earlier) whether you consent to the instruction:

Government Exhibit 411 is a June 2011 letter regarding an April 2011 transaction involving Stratus International Contracting Company. You saw that evidence this morning instead of earlier in trial because the

government failed to turn it over before trial as required by law. The defendant learned of that evidence on Saturday afternoon when the government disclosed it.

Nicholas P. Silverman
Associate
nsilverman@step toe.com

Step toe

+1 202 429 8096 direct	Step toe & Johnson LLP
+1 617 595 6559 mobile	1330 Connecticut Avenue, NW
+1 202 429 3902 fax	Washington, DC 20036
	www.step toe.com

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EXHIBIT 57

Kim, Jane (USANYS) 4

From: Krouse, Michael (USANYS)
Sent: Sunday, March 8, 2020 1:29 PM
To: Lake, Stephanie (USANYS)
Cc: Lynch, Garrett (USANYS) [Contractor]; Kim, Jane (USANYS) 4
Subject: Re: GX 411 - Response Requested by 2:00 p.m. or Earlier

I'm fine with that.

Sent from my iPhone

On Mar 8, 2020, at 1:19 PM, Lake, Stephanie (USANYS) <SLake@usa.doj.gov> wrote:

Emil thinks we should say we're not offering. Then if they actually want it in themselves / can articulate some real Brady theory, we'll have to deal with it. Apparently Crotty gave a similar instruction in Shulte....

On Mar 8, 2020, at 1:18 PM, Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov> wrote:

In my office. Grab me whenever.

From: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>
Sent: Sunday, March 8, 2020 1:16 PM
To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>
Cc: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>
Subject: Re: GX 411 - Response Requested by 2:00 p.m. or Earlier

I talked to Emil. Are you guys here / can we gather?

On Mar 8, 2020, at 1:11 PM, Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov> wrote:

It'll just be a screamfest. Unless there's specific information you think we'll get.

From: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>
Sent: Sunday, March 8, 2020 12:53 PM
To: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>
Cc: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>
Subject: Re: GX 411 - Response Requested by 2:00 p.m. or Earlier

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<MKrouse@usa.doj.gov> wrote:

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and the defense witnesses?

Sent from my iPhone

On Mar 8, 2020, at 12:23 PM, Krouse, Michael (USANYS)
<MKrouse@usa.doj.gov> wrote:

Yeah, we do not consent.

Sent from my iPhone

On Mar 8, 2020, at 12:16 PM, Lake,
Stephanie (USANYS)
<SLake@usa.doj.gov> wrote:

Wtf.

From: Silverman,
Nicholas
<nsilverman@steptoe.com>

Sent: Sunday, March
08, 2020 12:15 PM

To: Kim, Jane (USANYS)
4

<JKim4@usa.doj.gov>;
Krouse, Michael
(USANYS)

<MKrouse@usa.doj.gov
>; Lake, Stephanie
(USANYS)

<SLake@usa.doj.gov>;
'Garrett Lynch'
<LynchG@dany.nyc.gov
>

Cc: Bishop, Bruce
<BBishop@steptoe.com
>; Fragale, David
<Dfragale@steptoe.com
>; Heberlig, Brian
<BHeberlig@steptoe.com
>; Weingarten, Reid

<RWeingarten@stepsto.com>

Subject: GX 411 -
Response Requested by
2:00 p.m. or Earlier

Counsel:

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nsilverman@step toe.com

Step toe

+1 202 429 8096 direct
+1 617 595 6559 mobile
+1 202 429 3902 fax

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EXHIBIT 58

Kim, Jane (USANYS) 4

From: Kim, Jane (USANYS) 4
Sent: Sunday, March 8, 2020 1:33 PM
To: Krouse, Michael (USANYS)
Cc: Lake, Stephanie (USANYS); Lynch, Garrett (USANYS) [Contractor]
Subject: Re: GX 411 - Response Requested by 2:00 p.m. or Earlier

I'll be in in 30.

On Mar 8, 2020, at 1:29 PM, Krouse, Michael (USANYS) <MKrouse@usa.doj.gov> wrote:

I'm fine with that.

Sent from my iPhone

On Mar 8, 2020, at 1:19 PM, Lake, Stephanie (USANYS) <SLake@usa.doj.gov> wrote:

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In my office. Grab me whenever.

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Sent: Sunday, March 8, 2020 1:16 PM
To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>
Cc: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>
Subject: Re: GX 411 - Response Requested by 2:00 p.m. or Earlier

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Sent: Sunday, March 8, 2020 12:53 PM

To: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>
Cc: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>
Subject: Re: GX 411 - Response Requested by 2:00 p.m. or Earlier

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Sent from my iPhone

On Mar 8, 2020, at 12:16 PM, Lake, Stephanie (USANYS) <SLake@usa.doj.gov> wrote:

Wtf.

From: Silverman, Nicholas <nsilverman@steptoe.com>
Sent: Sunday, March 08, 2020

12:15

PM

To:

Kim,

Jane

(USANY

S) 4

<[JKim4](mailto:JKim4@usa.doj.gov)

[@usa.d](mailto:JKim4@usa.doj.gov)

[oj.gov](mailto:JKim4@usa.doj.gov)>;

Krouse,

Michael

(USANY

S)

<[MKrouse](mailto:MKrouse@usa.doj.gov)

[use@us](mailto:MKrouse@usa.doj.gov)

[a.doj.g](mailto:MKrouse@usa.doj.gov)

[ov](mailto:MKrouse@usa.doj.gov)>;

Lake,

Stepha

nie

(USANY

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<[SLake](mailto:SLake@usa.doj.gov)

[@usa.d](mailto:SLake@usa.doj.gov)

[oj.gov](mailto:SLake@usa.doj.gov)>;

'Garrett

Lynch'

<[Lynch](mailto:LynchG@dan.y.nyc.gov)

[G@dan](mailto:LynchG@dan.y.nyc.gov)

[y.nyc.g](mailto:LynchG@dan.y.nyc.gov)

[ov](mailto:LynchG@dan.y.nyc.gov)>

Cc:

Bishop,

Bruce

<[BBishop](mailto:BBishop@step.toe.com)

[p@step](mailto:BBishop@step.toe.com)

[toe.co](mailto:BBishop@step.toe.com)

[m](mailto:BBishop@step.toe.com)>;

Fragale,

David

<[DFrag](mailto:DFragment@step.toe.com)

[ale@st](mailto:DFragment@step.toe.com)

[eptoe.c](mailto:DFragment@step.toe.com)

[om](mailto:DFragment@step.toe.com)>;

Heberli

g, Brian

<[BHebe](mailto:BHeberlig@step.toe.com)

[rlig@st](mailto:BHeberlig@step.toe.com)

[eptoe.c](mailto:BHeberlig@step.toe.com)

[om](mailto:BHeberlig@step.toe.com)>;

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<RWeingarten@steptoe.com>

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Nicholas P. Silverman
Associate
nsilverman@step toe.com

**Step
toe**

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EXHIBIT 59

Kim, Jane (USANYS) 4

From: Krouse, Michael (USANYS)
Sent: Sunday, March 8, 2020 3:51 PM
To: Lake, Stephanie (USANYS); Kim, Jane (USANYS) 4; Garrett Lynch; Lynch, Garrett (USANYS) [Contractor]
Subject: FW: Activity in Case 1:18-cr-00224-AJN USA v. Nejad Letter Motion

This could have been worse, I think.

From: NYSD_ECF_Pool@nysd.uscourts.gov <NYSD_ECF_Pool@nysd.uscourts.gov>
Sent: Sunday, March 8, 2020 3:20 PM
To: CourtMail@nysd.uscourts.gov
Subject: Activity in Case 1:18-cr-00224-AJN USA v. Nejad Letter Motion

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U.S. District Court

Southern District of New York

Notice of Electronic Filing

The following transaction was entered by Heberlig, Brian on 3/8/2020 at 3:20 PM EDT and filed on 3/8/2020

Case Name: USA v. Nejad
Case Number: [1:18-cr-00224-AJN](#)
Filer: Dft No. 1 - Ali Sadr Hashemi Nejad
Document Number: [274](#)

Docket Text:

LETTER MOTION addressed to Judge Alison J. Nathan from Brian M. Heberlig dated March 8, 2020 re: Curative Instruction re GX 411 . Document filed by Ali Sadr Hashemi Nejad.
(Attachments: # (1) Exhibit A - GX 411, # (2) Exhibit B - Transcript of Curative Instruction)(Heberlig, Brian)

1:18-cr-00224-AJN-1 Notice has been electronically mailed to:

Andrew James DeFilippis andrew.defilippis@usdoj.gov, CaseView.ECF@usdoj.gov,
USANYS.ECF@USDOJ.GOV

Brian Matthew Heberlig bheberlig@steptoe.com, bhamerschlag@steptoe.com, Mwielkop@steptoe.com,
nsilverman@steptoe.com

Bruce C. Bishop bbishop@steptoe.com

David Matthew Fragale dfragale@steptoe.com

David William Denton, Jr david.denton@usdoj.gov, CaseView.ECF@usdoj.gov,
USANYS.ECF@USDOJ.GOV

Jane Kim jane.kim@usdoj.gov, USANYS.ECF@USDOJ.GOV

Matthew Joseph Laroche matthew.laroche@usdoj.gov, CaseView.ECF@usdoj.gov,
USANYS.ECF@USDOJ.GOV

Michael Kim Krouse michael.krouse@usdoj.gov, CaseView.ECF@usdoj.gov,
USANYS.ECF@USDOJ.GOV

Michelle Lynn Levin mlevin@steptoe.com, chartman@steptoe.com, ocorn@steptoe.com, spu@steptoe.com

Nicholas Paul Silverman nsilverman@steptoe.com

Rebekah Allen Donaleski Rebekah.Donaleski@usdoj.gov, CaseView.ECF@usdoj.gov,
USANYS.ECF@USDOJ.GOV

Reid Weingarten rweingarten@steptoe.com

Stephanie Lindsay Lake stephanie.lake@usdoj.gov, CaseView.ECF@usdoj.gov,
USANYS.ECF@USDOJ.GOV

1:18-cr-00224-AJN-1 Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1008691343 [Date=3/8/2020] [FileNumber=23689567-0
] [4bcab8d6e997ff1e6849482727f914bc3d85dd9d8edf8ecb49c3f7217cefeb7c7af
8cd1238af5cfa19056c8618d17454222a420a3cd0cc909f049aaf91d78d15]]

Document description:Exhibit A - GX 411

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1008691343 [Date=3/8/2020] [FileNumber=23689567-1
] [3d6df087e158911cef9c44f9ca5baaa38df82f89da28f73abc12f8758c3ad5f0b57
94476e79bdaf40d2ead63a149cf19f4bf79939288fde4c11e4c8338a95462]]

Document description:Exhibit B - Transcript of Curative Instruction

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1008691343 [Date=3/8/2020] [FileNumber=23689567-2

] [8042b8d1bf6f842028d3363912338739015f72456ba87b3d4cd7331e9df8d09ce47
6941d511d21705ecc9f2defe8e13b670a5b28df85c794deb65bfe8ad6c7a5]]

EXHIBIT 60

Kim, Jane (USANYS) 4

From: Nathan NYSD Chambers <NathanNYSDChambers@nysd.uscourts.gov>
Sent: Sunday, March 8, 2020 4:04 PM
To: Kim, Jane (USANYS) 4; Lake, Stephanie (USANYS); Bbishop_steptoe.com; Fragale, David; Levin, Michelle; Silverman, Nicholas; Weingarten, Reid; Lynch, Garrett; Lynch, Garrett (USANYS) [Contractor]; Heberlig, Brian; Krouse, Michael (USANYS)
Subject: RE: Order in 18cr224
Attachments: 18cr224 Order 3.8.2020.pdf

Counsel,

Attached please find another Order from Judge Nathan that will appear on the docket on Monday. Please confirm receipt.

Sincerely,
Alyssa O'Gallagher
Law Clerk to the Hon. Alison J. Nathan

From: Nathan NYSD Chambers
Sent: Sunday, March 8, 2020 12:48 PM
To: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Bbishop_steptoe.com <Bbishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>; Levin, Michelle <mlevin@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Weingarten, Reid <RWeingarten@steptoe.com>; Lynch, Garrett <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Heberlig, Brian <BHeberlig@steptoe.com>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>
Subject: RE: Order in 18cr224

Counsel,

Please confirm receipt of this Order.

Sincerely,
Alyssa O'Gallagher
Law Clerk to the Hon. Alison J. Nathan

From: Nathan NYSD Chambers
Sent: Sunday, March 8, 2020 12:41 PM
To: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Bbishop_steptoe.com <Bbishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>; Levin, Michelle <mlevin@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Weingarten, Reid <RWeingarten@steptoe.com>; Lynch, Garrett <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <Garrett.Lynch@usdoj.gov>; Heberlig, Brian <BHeberlig@steptoe.com>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>
Subject: Order in 18cr224

Counsel,

Attached please find an Order from Judge Nathan that will appear on the docket on Monday.

Sincerely,
Alyssa O’Gallagher
Law Clerk to the Hon. Alison J. Nathan

EXHIBIT 60-1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

United States of America,

—v—

Ali Sadr Hashemi Nejad,

Defendant.

18-cr-224 (AJN)

ORDER

ALISON J. NATHAN, District Judge:

On March 8, 2020, Mr. Sadr filed a letter requesting a curative instruction with respect to Government Exhibit 411. *See* Dkt. No. 274. The Government shall respond to Mr. Sadr's March 8 letter by no later than 7 p.m. on March 8, 2020.

SO ORDERED.

Dated: March 8, 2020
New York, New York

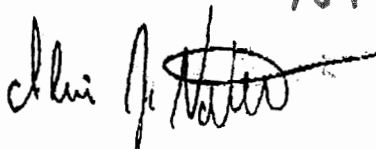
3/8/20

ALISON J. NATHAN
United States District Judge

EXHIBIT 61

Kim, Jane (USANYS) 4

From: Krouse, Michael (USANYS)
Sent: Sunday, March 8, 2020 4:04 PM
To: Crowley, Shawn (USANYS); Bove, Emil (USANYS); Lake, Stephanie (USANYS); Kim, Jane (USANYS) 4; Garrett Lynch; Lynch, Garrett (USANYS) [Contractor]
Subject: Defense letter re curative instruction
Attachments: Defense letter re curative instruction (March 8, 2020).pdf

This is what they filed.

Michael Krouse
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2279

EXHIBIT 61-1

Brian M. Heberlig
202 429 8134
bheberlig@steptoe.com

Steptoe

1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.steptoec.com

March 8, 2020

By ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007

Re: *United States v. Ali Sadr Hashemi Nejad*, Case No. 18-cr-224 (AJN)

Dear Judge Nathan:

On behalf of Defendant Ali Sadr Hashemi Nejad, we write to request a curative instruction. We have conferred with the government who stated that it opposes this request.

On Saturday afternoon around 4:00 p.m., the government produced GX 411 (attached as Exhibit A), which had not been previously disclosed to the defense. GX 411 reveals that in connection with the first U.S. dollar payment in this case, the intermediary bank wrote a letter to OFAC disclosing certain information about the transactions. Among other things, the intermediary bank disclosed to OFAC that Stratus Turkey (Stratus International Contracting J.S.) was affiliated with Stratus Iran (Stratus International Contracting Company) and implied that the two companies were either unitary or cooperating on the Ojeda project in Venezuela. The intermediary bank attached Stratus Iran's website describing its ongoing work on the Ojeda project. The intermediary bank concluded that this information was not subject to mandatory disclosure as indicated by its note that it was "voluntarily informing OFAC." The government has not produced any response from OFAC and to defense counsel's knowledge, no response exists. *Cf.* Tr. 580, Test. of Ted Kim (Mar. 5, 2020) (agreeing that to his knowledge, "this matter was never investigated by OFAC").

GX 411 is exculpatory evidence that:

- Stratus Turkey's affiliation with Stratus Iran was not material either to OFAC or the intermediary banks;
- intermediary banks conducted independent investigation and could easily identify the affiliation between Stratus Turkey and Stratus Iran or even (erroneously)

The Honorable Alison J. Nathan
March 8, 2020
Page 2

conclude that the two companies were a single entity that “may be an Iranian company”; and

- neither the intermediary bank nor OFAC deemed the disparities in information about the two Stratus International Contractings working on the Ojeda project as important enough to stop U.S. dollar payments to Stratus International Contracting J.S.

The government should have disclosed GX 411 under *Brady*, *Giglio*, and Rule 16.

In light of the government’s failure to disclose this evidence before trial,¹ the defense respectfully requests a curative instruction. Based on a similar mid-trial disclosure in *United States v. Slough*, Judge Lamberth issued the curative instruction attached as Exhibit B. The defense has pasted that instruction below, edited only to reflect the facts of this case:

Government Exhibit 411 is a June 2011 letter regarding an April 2011 transaction involving Stratus International Contracting Company. You saw that evidence this morning instead of earlier in trial because the government failed to turn it over before trial as required by law. The defendant learned of that evidence on Saturday afternoon when the government disclosed it.

Tr. 6, *United States v. Slough*, No. 08-cr-360-RCL (D.D.C. Aug. 5, 2014) (relevant text highlighted in Ex. B). The defense requests that this instruction be read to the jury on Monday after GX 411 is admitted. The government opposes this request but does not object to the defense admitting this document in its case if the government chooses not to offer it.

Respectfully submitted,

/s/ Brian M. Heberlig
Reid H. Weingarten
STEPTOE & JOHNSON LLP
1114 Avenue of the Americas
New York, NY 10036
Tel: (212) 506-3900
Fax: (212) 506-3950
rweingarten@steptoe.com

¹ The government represents that it learned of this evidence in mid-January 2020 and that it came from an unrelated DANY investigation. The government states that it believed this document was part of the Commerzbank subpoena return that was produced in discovery. It was not.



The Honorable Alison J. Nathan
March 8, 2020
Page 3

Brian M. Heberlig (*Pro Hac Vice*)
Bruce C. Bishop (*Pro Hac Vice*)
David M. Fragale
Nicholas P. Silverman (*Pro Hac Vice*)
STEPTOE & JOHNSON LLP
1330 Connecticut Avenue, N.W.
Washington, DC 20036
Tel: (202) 429-3000 Bishop
Fax: (202) 429-3902
bheberlig@steptoe.com

Counsel for Defendant Ali Sadr Hashemi Nejad

cc: Counsel of Record (via ECF)

EXHIBIT 62

Kim, Jane (USANYS) 4

From: Crowley, Shawn (USANYS)
Sent: Sunday, March 8, 2020 4:04 PM
To: Krouse, Michael (USANYS); Bove, Emil (USANYS); Lake, Stephanie (USANYS); Kim, Jane (USANYS) 4; Garrett Lynch; Lynch, Garrett (USANYS) [Contractor]
Subject: RE: Defense letter re curative instruction

Thanks. Can you send us the document itself?

From: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>
Sent: Sunday, March 08, 2020 4:04 PM
To: Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>; Bove, Emil (USANYS) <EBove@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Garrett Lynch <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>
Subject: Defense letter re curative instruction

This is what they filed.

Michael Krouse
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2279

EXHIBIT 63

Kim, Jane (USANYS) 4

From: Krouse, Michael (USANYS)
Sent: Sunday, March 8, 2020 4:07 PM
To: Crowley, Shawn (USANYS); Bove, Emil (USANYS); Lake, Stephanie (USANYS); Kim, Jane (USANYS) 4; Garrett Lynch; Lynch, Garrett (USANYS) [Contractor]
Subject: RE: Defense letter re curative instruction
Attachments: GX 411.pdf

From: Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>
Sent: Sunday, March 8, 2020 4:04 PM
To: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Bove, Emil (USANYS) <EBove@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Garrett Lynch <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>
Subject: RE: Defense letter re curative instruction

Thanks. Can you send us the document itself?

From: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>
Sent: Sunday, March 08, 2020 4:04 PM
To: Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>; Bove, Emil (USANYS) <EBove@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Garrett Lynch <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>
Subject: Defense letter re curative instruction

This is what they filed.

Michael Krouse
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2279

EXHIBIT 63-1



NEW YORK BRANCH

Department of the Treasury
Office of Foreign Assets Control
1500 Pennsylvania Avenue NW
Washington DC 20220

Vinay Jepak
2 World Financial Center, New York, NY 10281-1050
Telephone (212) 266-7200
Fax (212) 266-7235
vinay.jepak@commerzbank.com

June 16, 2011

Re: Information Sharing – Stratus International Contracting Company

Dear Sir/Madam:

Commerzbank AG, New York Branch (CBNY) would like to share the following information with OFAC. On April 20, 2011 CBNY's AML transaction monitoring system generated an alert, which involved a transaction for USD 29,442,967.57 value April 4, 2011.

The transaction was originated by Banco Del Tesoro, CA Banco Universal Caracas for its client BT / Fideicomiso / Fondo Chino Venezolano in Caracas, Venezuela. The beneficiary of the payment was Stratus International Contracting Company ("Stratus"), a client of Hyposwiss Privatbank AG, Zurich.

As per standard procedure, CBNY initiated a request for information to the remitting bank Banco Del Tesoro, CA Banco Universal Caracas, Venezuela to obtain details on both entities and their relationship. In the interim, CBNY conducted further due diligence and noted the following regarding Stratus from its website:

- Stratus was founded in 1978 in Tehran, Iran
- Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings.
- Stratus is presently working on a 7000 Apartment Unit "New Ojeda" Housing Development Project in Venezuela

On May 12, 2011, CBNY received a response from the bank in Caracas indicating the following:

- Stratus's physical address is Gardenya Plaza 5, K:3 D:3 (Floor 3, Suite3) 34758 Atasehir, Istanbul, Turkey
- Stratus is registered in Istanbul, Turkey (copy of the registration attached)
- Stratus provides construction services in Turkey, Dubai and Venezuela
- The purpose of the payment is for the construction of a 7000 apartment unit project "Proyecto Urbanismo Nueva Ciudad Fabricio Ojeda, in Ciudad Ojeda, Estado Zulia, Venezuela (same address as listed on Stratus' website)

Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information between the website and the response forwarded by the bank in Caracas, CBNY believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company.

Chairman of the Supervisory Board: Klaus-Peter Müller
Board of Managing Directors: Martin Blessing (Chairman),
Frank Annuscheit, Markus Beumer, Achim Kassow, Jochen Klösges,
Michael Reuther, Stefan Schmittmann, Ulrich Sieber, Eric Strutz, Martin Zielke

Commerzbank Aktiengesellschaft, Frankfurt am Main
Registered Office: Frankfurt am Main Reg.No. 32000
VAT No. DE 114 103 514



NEW YORK BRANCH

Re: Information Sharing – Stratus International Contracting Company– Page 2

We have added Stratus into our sanctions filter to monitor any future payments. Please note that apart from this transaction, there have not been any other payments involving Stratus processed by CBNY to date.

The purpose of this letter is to report the good faith efforts of Commerzbank AG, New York Branch in complying with applicable OFAC requirements and voluntarily informing OFAC of any information received during its investigation into possible sanctions-related entities.

Should you have any further questions concerning this matter, please do not hesitate to contact the signatories below.

Respectfully,

Commerzbank AG
New York Branch

A handwritten signature in dark ink, appearing to read "Deepa Keswani".

Deepa Keswani
Head of AML/Anti-Fraud/Sanctions Compliance

A handwritten signature in dark ink, appearing to read "Vinay Jepal".

Vinay Jepal
Sanctions Compliance Officer

Encls.

stratus intl payment

:LT Address	:COBAUS3XA
:transaction type	:202 COVER bank tfr favour 3rd bank
:input from	:COBADEFF
	COMMERZBANK AG FRANKFURT
	HEAD OFFICE
	32-36 NEUE MAINZERSTRASSE
	60261 FRANKFURT GERMANY
:Validation Flag	:COV}

{4: Text block:

:20 /transaction reference number	:FAAS109400150500
:21 /related reference	:FAAS109400150500
:32A/value date	:040411 USD 29,442,967.57
:52A/ordering institution - BIC	:COBADEFF
	COMMERZBANK AG
	FRANKFURT AM MAIN
:57A/account with inst - BIC	:CHASUS33
	JPMORGAN CHASE BANK, N.A.
	NEW YORK,NY
:58A/beneficiary inst - BIC	:SHHBCHZZ
	HYPOSWISS PRIVATBANK AG, ZURICH
	ZURICH
:50K/ordering customer	:/400887746602USD
	BT/ FIDEICOMISO / FONDO CHINO
	VENEZOLANO. AV GUICAIPURO. URB EL
	ROSAL. TORRE BANCO DEL TESORO.
	CARACAS - VENEZUELA.
:52A/ordering institution - BIC	:BDTEVECA
	BANCO DEL TESORO, C.A. BANCO
	UNIVERSAL
	CARACAS
:59 /beneficiary customer	:/CH7708530519663100203
	STRATUS INTERNATIONAL CONTRACTING
	J.S.
:70 /details of payment	:REF: DESEMBOLSO NRO. 386 FONDO
	CHINO VENEZOLANO. CODIGO NRO.
	00579.
:33B/amount	:USD 29,442,967.57}

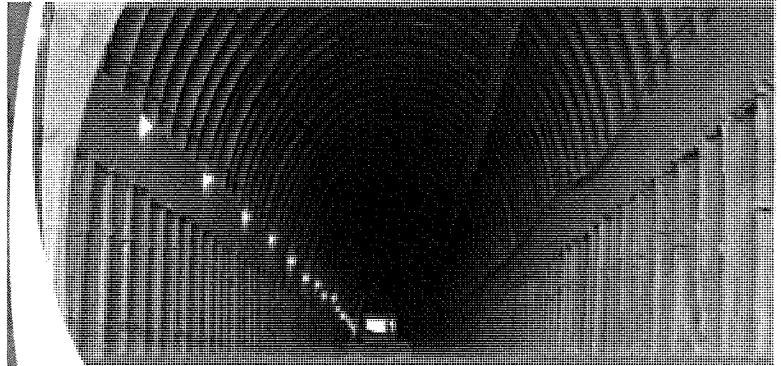
Entry : /SWIFT/ Date:110404 Time:02:44:17
Info:1111/001781



Stratus International
Contracting Company

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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of RIs 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received **"Exemplary Exporters"** of the year 1999 from his excellency Mr. president.



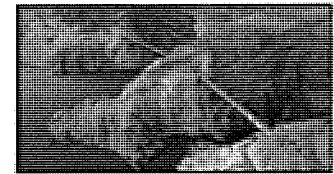
- STRATUS is an Engineering, Construction, Management and Contracting Company by specializing in the field of Building Construction, Road Works and Water Works.

STRATUS is Graded in three major categories: [Read more...](#)

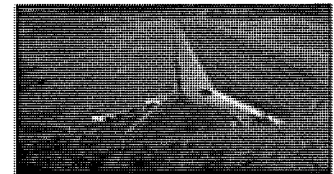
- STRATUS has succeeded to receive ISO 9001-2000 certificate for Quality Management System from MIC registered under UKAS, United Kingdom from 2004 which upgraded recently to ISO 9001-2008 in 2010 and intending to extend it by OHSAS 18001:2007. [Read more...](#)

- Our memberships:
 - Federation of Contractors of Islamic Countries (F.C.I.C.)
 - Pakistan Engineering Council
 - International Chamber of Commerce (I.C.C.)
 - Iran – UK Chamber of Commerce
 - Iran – Canada Chamber of Commerce [Read more...](#)

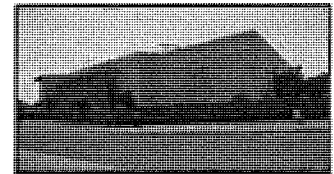
Road & Railway

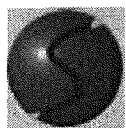


Dam



Building

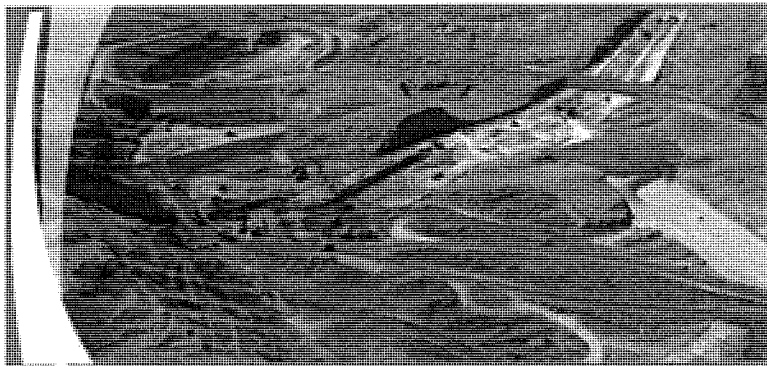




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Contact Us

STRATUS International Contracting Co.

Address: **No.35, Golestan St., Iran Zamin Ave., Shahrake Ghods, Tehran, Iran.**

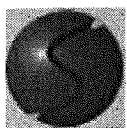
Postal Code: **1465865187**

Tell: **(98) 21 8837 3100-6**

Fax: **(98) 21 8808 2882**

E-mail: **stratus@stratusgc.com**

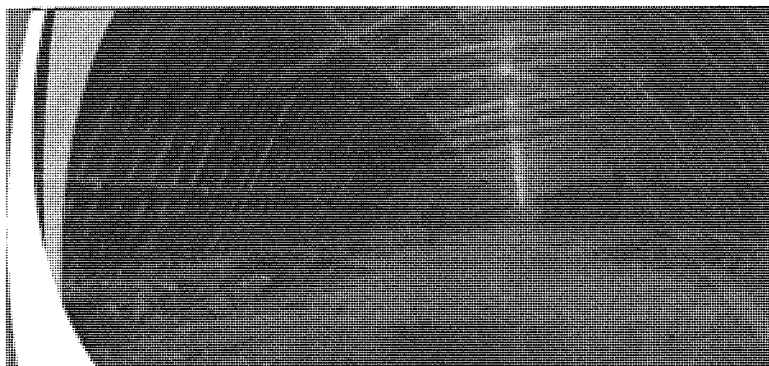
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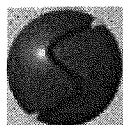
Branch Offices

Middle East
Iran
Iraq

CIS
Kazakhstan

South America
Venezuela

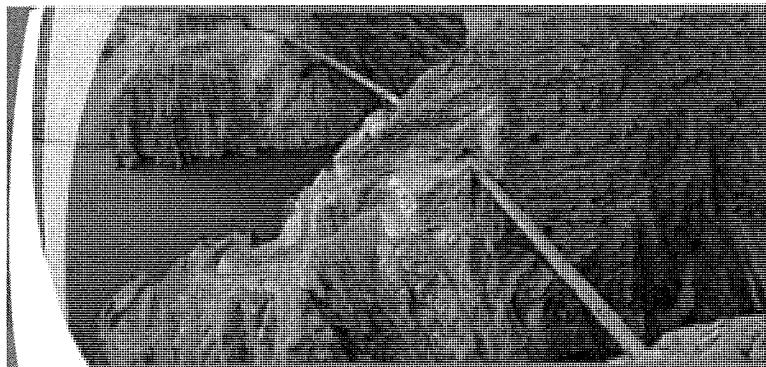
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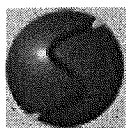
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Sister Companies List

-  1. Samaneh Stratus (INVESTMENT CO.)
-  2. Iran Construction Investment Co.
-  3. Eghtesad - Novin Bank
4. Pishgaman Bazar Novin (BROKERAGE CO.)
-  5. Novin Insurance Co.
-  6. Pars Shahr Co.
-  7. Global Petro Tech CO.
-  8. Keyhan Tabadol Co.
-  9. Pars Hanza Aluminium CO.
-  10. Azarbaijan Industry Development Co.
11. Eghtesad Novin Investment CO.
-  12. Samaneh Gostar Novin

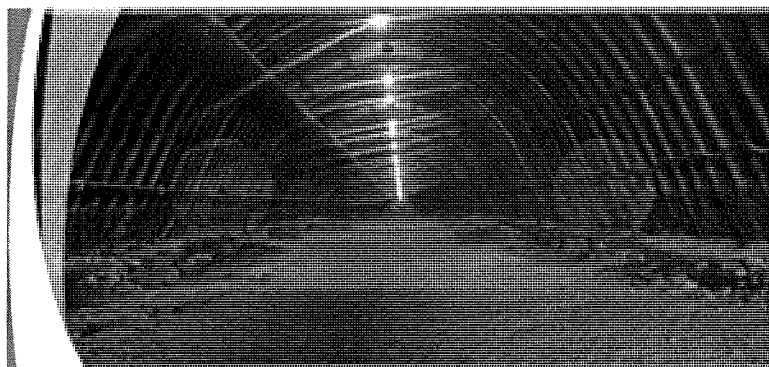
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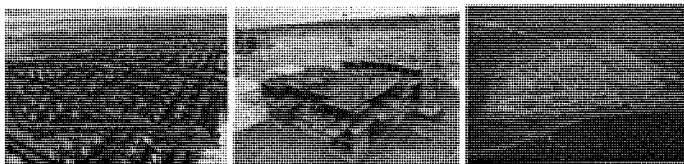
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7000 Units 'New Ojeda' Housing Development Project

Main Technical Features	Site Gross Area : 318 Hec. Concrete works : 520,000 m ³ Net Construction Area : 850.000 m ² Water & Sewage network : 150 Km Electrical network : 200 Km Communication network : 220 Km Gas network : 30 Km
Location	Ciudad Ojeda, Zulia State, Venezuela
Employer	Ducolsa 'Urban Development S.A'
Contract Duration	48 Months
Date of Award	September 2009
Status	[Under Construction]



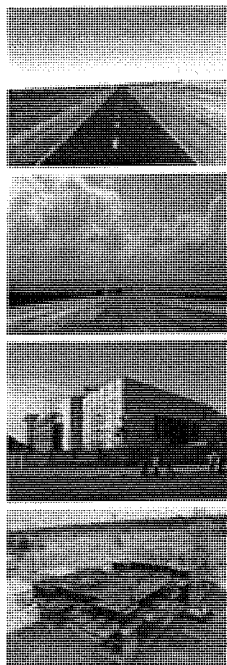
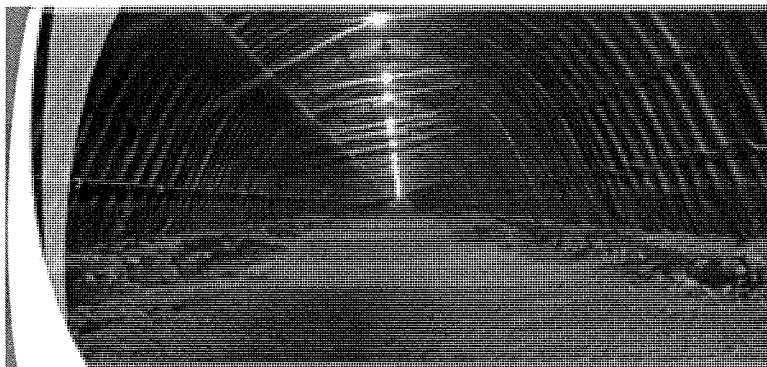
[\[Back to list\]](#)



Stratus International
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Dalbandin – Nokkundi Highway - Section III-B

[Details >>](#)

Socotra Airport

[Details >>](#)

Design & Construction of Parliament Building & Commercial Center in Djibouti City

[Details >>](#)

7000 Units "New Ojeda" Housing Development Project

[Details >>](#)

T.C.
İSTANBUL
Ticaret Sicil Memurluğu

(KADIKÖY)
370857 - 2010

SİCİL TASDİKNAME Sİ

Ticaret Ünvanı	STRATUS INTERNATIONAL CONTRACTING İNŞAAT VE TAAHHÜT ANONİM ŞİRKETİ
Sicil No.	751671
Tescil Tarihi	22 / 10 / 2010
İşletme Merkezinin Adresi (Şubenin tescilinde şubenin Adresi ile beraber,merkezin adresi de yazılır.)	GARDENYA PLAZA 5 K.3 D.3 ATAŞEHİR
İşletmenin uğraştığı işler	Ana sözleşmesinde yazılı olan işler
İşletme sahibinin hüviyeti (Hükmi şahıslarda, hükmi şahsın mahiyeti)	Anonim
İşletme temsilcileri	38824643592 TC.No.lu CELAL TATLICIBAŞI
Tasdiknamenin düzenlenme Tarih ve Sayısı	22 EKİM 2010 - 39185

RECAİ SÖKMEN
İSTANBUL TİCARET SİCİLİ
MEMURU YARDIMCISI

